
State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Filing at a Glance

Company:	RiverSource Life Insurance Company
Product Name:	Long Term Care
State:	Virginia
TOI:	LTC03I Individual Long Term Care
Sub-TOI:	LTC03I.001 Qualified
Filing Type:	Rate
Date Submitted:	08/03/2017
SERFF Tr Num:	AERS-131005512
SERFF Status:	Closed-Approved
State Tr Num:	AERS-131005512
State Status:	Approved
Co Tr Num:	30160A-VA, 32100 2017
Implementation	On Approval
Date Requested:	
Author(s):	Cheryl Meyer, Kathleen Felton, Peg VanDrisse, Lynn Blount
Reviewer(s):	Bill Dismore (primary)
Disposition Date:	10/26/2020
Disposition Status:	Approved
Implementation Date:	

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

General Information

Project Name: 30160A-VA, 32100 2017
Project Number: 30160A-VA, 32100 2017
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact: 32.3%

Deemer Date: 08/27/2020
Submitted By: Peg VanDrisse

Status of Filing in Domicile: Not Filed
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Individual
Individual Market Type:
Filing Status Changed: 10/26/2020
State Status Changed: 10/26/2020
Created By: Peg VanDrisse
Corresponding Filing Tracking Number:
State TOI: LTC03I Individual Long Term Care

Filing Description:

Please see the attached cover letter.

Company and Contact

Filing Contact Information

Peg VanDrisse, Sr. Contract Analyst
9550 Ameriprise Financial Center
H25/9550
Minneapolis, MN 55474

peg.vandrisse@ampf.com
612-671-8584 [Phone]
612-678-0034 [FAX]

Filing Company Information

RiverSource Life Insurance
Company
9550 Ameriprise Financial Center,
H22/9550
Minneapolis, MN 55474
(612) 671-2465 ext. [Phone]

CoCode: 65005
Group Code: 4
Group Name:
FEIN Number: 41-0823832

State of Domicile: Minnesota
Company Type: Life
Insurance
State ID Number:

Filing Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Bill Dismore	10/26/2020	10/26/2020

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Info has been requested from company	Bill Dismore	06/22/2020	06/22/2020
Info has been requested from company	Bill Dismore	10/01/2019	10/01/2019
Info has been requested from company	Bill Dismore	04/12/2019	04/12/2019
Info has been requested from company	Bill Dismore	12/17/2018	12/17/2018
Info has been requested from company	Bill Dismore	12/13/2018	12/13/2018
Info has been requested from company	Bill Dismore	10/23/2018	10/23/2018
Info has been requested from company	Janet Houser	08/11/2017	08/11/2017

Response Letters

Responded By	Created On	Date Submitted
Lynn Blount	07/28/2020	07/28/2020
Lynn Blount	11/25/2019	11/25/2019
Lynn Blount	05/06/2019	05/07/2019
Peg VanDrisse	12/17/2018	12/17/2018
Lynn Blount	12/14/2018	12/14/2018
Lynn Blount	12/13/2018	12/13/2018
Peg VanDrisse	07/12/2018	07/13/2018

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	Statements of Variability	Lynn Blount	09/12/2018	09/12/2018

SERFF Tracking #:

AERS-131005512

State Tracking #:

AERS-131005512

Company Tracking #:

30160A-VA, 32100 2017

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A-VA, 32100 2017/30160A-VA, 32100 2017

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Extension granted to respond by 7/27/2020	Note To Filer	Bill Dismore	07/14/2020	07/14/2020
Extension Request	Note To Reviewer	Lynn Blount	07/14/2020	07/14/2020
Status Request	Note To Filer	Bill Dismore	05/22/2020	05/22/2020
Status Request	Note To Reviewer	Lynn Blount	05/22/2020	05/22/2020
Status Request	Note To Filer	Bill Dismore	04/03/2020	04/03/2020
Status Request	Note To Reviewer	Lynn Blount	04/03/2020	04/03/2020
Extension Granted	Note To Filer	Bill Dismore	11/14/2019	11/14/2019
Extension Request	Note To Reviewer	Lynn Blount	11/13/2019	11/13/2019
Status Request	Note To Filer	Bill Dismore	09/12/2019	09/12/2019
Status Request	Note To Reviewer	Lynn Blount	09/12/2019	09/12/2019
Status Request	Note To Filer	Bill Dismore	07/29/2019	07/29/2019
Status Request	Note To Reviewer	Lynn Blount	07/29/2019	07/29/2019
Status Request	Note To Filer	Bill Dismore	06/14/2019	06/14/2019
Status Request	Note To Reviewer	Lynn Blount	06/13/2019	06/13/2019
Status Request	Note To Filer	Bill Dismore	02/27/2019	02/27/2019
Status Request	Note To Reviewer	Lynn Blount	02/26/2019	02/26/2019
Response Due	Note To Reviewer	Lynn Blount	12/11/2018	12/11/2018
Extension Request	Note To Reviewer	Lynn Blount	12/06/2018	12/06/2018
Extension Request	Note To Reviewer	Lynn Blount	11/27/2018	11/27/2018
Amended Filing	Note To Filer	Bill Dismore	11/13/2018	11/13/2018
Question	Note To Reviewer	Lynn Blount	11/13/2018	11/13/2018
Statements of Variability and tracking numbers	Note To Reviewer	Lynn Blount	09/12/2018	09/12/2018
Actuarial Final Summary & Opinion Report	Reviewer Note	Bill Dismore	10/26/2020	
Call from Company	Reviewer Note	Bill Dismore	10/21/2019	
Rate Review - Co. Response to Objection on 5/06/2019	Reviewer Note	Bill Dismore	03/14/2019	
RRS	Reviewer Note	Bill Dismore	10/03/2018	

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Disposition

Disposition Date: 10/26/2020

Implementation Date:

Status: Approved

Comment:

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
RiverSource Life Insurance Company	40.000%	40.000%	\$1,091,101	1,501	\$2,734,228	40.000%	40.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Certification of Compliance	Received & Acknowledged	Yes
Supporting Document (revised)	Product Checklist	Received & Acknowledged	Yes
Supporting Document (revised)	L&H Actuarial Memorandum	Received & Acknowledged	Yes
Supporting Document (revised)	Long Term Care Insurance Rate Request Summary	Received & Acknowledged	Yes
Supporting Document (revised)	Policyholder Notification Letter Samples	Received & Acknowledged	Yes
Supporting Document	Misc Related Documents	Received & Acknowledged	Yes
Supporting Document	Cover Letter and Third Party Document	Received & Acknowledged	Yes
Supporting Document	Response letter and attachments	Received & Acknowledged	Yes
Supporting Document	Statements of Variability	Received & Acknowledged	Yes
Supporting Document	Response 12-12-18 and Response Attachments	Received & Acknowledged	Yes
Supporting Document	30165A Approval	Received & Acknowledged	Yes
Supporting Document	VA Percentage of Premium of Rider Form 30165A	Received & Acknowledged	Yes
Supporting Document	Response 5/6/2019	Received & Acknowledged	Yes
Supporting Document	Product Checklist	Withdrawn	No
Supporting Document	L&H Actuarial Memorandum	Withdrawn	No
Supporting Document	L&H Actuarial Memorandum	Withdrawn	No
Supporting Document	Long Term Care Insurance Rate Request Summary	Withdrawn	No
Supporting Document	Long Term Care Insurance Rate Request Summary	Withdrawn	No
Supporting Document	Policyholder Notification Letter Samples	Withdrawn	No

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate (revised)	VA PremiumRates 30160A_32100	Approved	Yes
Rate (revised)	withdrawn/combined in line one	Withdrawn	Yes
Rate (revised)	withdrawn/under supporting documentation tab	Withdrawn	Yes
Rate	VA PremiumRates 30160A 32100	Withdrawn	No
Rate	VA PremiumRates 30160A 32100	Withdrawn	No
Rate	VA PremiumRates 30160A 32100	Withdrawn	No
Rate	VA Percentage of Premium Rider Form 30165A	Withdrawn	No

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	06/22/2020
Submitted Date	06/22/2020
Respond By Date	07/22/2020

Dear Peg VanDrisse,

Introduction:

During our review, we noted the need for additional information to continue. Any revisions, modifications, or changes of any type to a filing not requested by us must be brought to our attention and explained in detail. It will expedite the review process if all changes are highlighted and explained.

Objection 1

Comments: The policyholder notification letter(s) are under review in SERFF AERS-131005529. The rate review process is pending the approval of the policyholder letter.

Please reply to this objection with, "Policyholder Letter Review completed on [Date] in SERFF AERS-131005529", once the company responds to the 6/22/2020 objection letter.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the revised forms to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

Sincerely,
Bill Dismore

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	10/01/2019
Submitted Date	10/01/2019
Respond By Date	11/25/2019

Dear Peg VanDrisse,

Introduction:

The submission is *DISAPPROVED* and may not be used in the Commonwealth of Virginia.

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- Response 5/6/2019 (Supporting Document)
- Policyholder Notification Letter Samples (Supporting Document)

Comments: Please explain or clarify the statement in your objection response of 5/06/2019 in which the Company states that with a 40% rate increase, the company will pursue future rate increase at the end of the three-year rate guarantee period. The policyholder notification letter states in the third paragraph, under the section labeled, "Reasons for this increase"; "...we may request regulatory approval for additional premium increases in the state of Virginia in the future but not for at less three years." The response letter indicates that the Company "will" pursue additional rate increases, while the policyholder notification letter indicates that the company "may" pursue additional increases.

Describe the triggers that will prompt the Company to request additional rate increases and explain how this is communicated to the policyholder.

Objection 2

- Policyholder Notification Letter Samples (Supporting Document)

Comments: Please provide "John Doe" letters for both the Waiver and Non-Waiver Policyholder Notification letters without the bracketed language. The BOI would like to see the letter as it will appear to a policyholder. Include one letter that includes a policy with the nonforfeiture endorsement form 32100.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

A response to this objection (or request for information if more applicable) is expected within 30 days. After 30 days, the filing will be *DISAPPROVED* unless a 30-day extension is requested.

Once a submission has been closed, a new SERFF submission will be required. To expedite the review, the new submission should reference the SERFF tracking number of the prior submission and verify that all outstanding issues have been addressed.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Sincerely,
Bill Dismore

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	04/12/2019
Submitted Date	04/12/2019
Respond By Date	05/10/2019

Dear Peg VanDrisse,

Introduction:

One or more items have additional questions as set forth below.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)
- Response 12-12-18 and Response Attachments (Supporting Document)

Comments: 1) In your response of 12/12/2018, the Company states that they can actuarially justify a much larger rate increase than the 40% requested. Please provide a detailed explanation of the Company's plans for future rate increase if the 40% rate increase were approved. Provide a description of the lifetime loss ratio to which the Company will manage this block of business going forward and what would trigger a request for an additional rate increase.

2) If the 40% rate increase were to be approved, the VA Cumulative Rate Increase would equal 86% while the nationwide increase is 68%. Please provide an explanation for this discrepancy in support of the Company's 40% rate increase request compared to a lesser increase of 26% which would bring the VA cumulative increase in line with the nationwide cumulative increase.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

A response to this objection (or request for information if more applicable) is expected within 30 days. After 30 days, the filing will be DISAPPROVED unless a 30-day extension is requested.

Once a submission has been closed, a new SERFF submission will be required. To expedite the review, the new submission should reference the SERFF tracking number of the prior submission and verify that all outstanding issues have been addressed.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

Sincerely,
Bill Dismore

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	12/17/2018
Submitted Date	12/17/2018
Respond By Date	01/03/2019

Dear Peg VanDrisse,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: Rate/Rule Schedule

Thank you for your prompt response to our objections received on 12/14/18. Since the rider form 30165A was previously approved under SERFF # AERS-129718202 and there are no changes to percentage of premium on the schedule, please remove the rider rate schedule from the Rate/Rule tab and place it under the Supporting Documentation tab.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned. Thank you.

Sincerely,
Bill Dismore

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	12/13/2018
Submitted Date	12/13/2018
Respond By Date	12/20/2018

Dear Peg VanDrisse,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: Please provide the SERFF tracking # for the approval of this rider form and rate (30165A). We could not find this form under the provided Previous State Filing Number: AERS-127792983.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned. Thank you.

Sincerely,
Bill Dismore

State: Virginia
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Filing Company: RiverSource Life Insurance Company

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	10/23/2018
Submitted Date	10/23/2018
Respond By Date	12/10/2018

Dear Peg VanDrisse,

Introduction:

During our review, we noted the following inconsistencies and/or need additional information to continue. Please note, any revisions, modifications, or changes of any type to a filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: 1.Please provide the overall A/E ratio for lapses under current assumptions for this block of business.

2.For all projections requested in the next question, the baseline should comply with the following:

a.Any limited-pay paid-up policies should be removed, both from historical experience and future projections.

b.For this pre-stability block, assumptions should be best-estimate, without margins for moderately adverse conditions.

c.Premiums should be at the Virginia rate level for both historical and projected future.

d.Please use the appropriate average maximum valuation interest rate for each product series for accumulation and discounting of this block as specified in 14VAC5-200-150.

e.Please ensure that the discount/accumulation formulas are working formulas and specify the interest rates used in each exhibit.

3.Because the Bureau has observed over the years that there is often internal subsidization occurring between policyholders with different policy characteristics, for each of the four subsets of the business corresponding to the combinations of (limited/lifetime benefit periods) and (without/with inflation protection), please provide (in Excel format) the following projections on a nationwide basis:

a.current assumptions and current rates

b.current assumptions and current rates, including paid-up policies (if any)

c.current assumptions with the proposed rate increase

d.current assumptions with the proposed rate increase, but with no shock lapses, benefit reductions, CBUL, or adverse selection (if applicable)

e.current assumptions with premiums restated as if the proposed rate schedule had been in effect from inception

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
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f. original assumptions and original premiums from inception with the actual distribution of business sold

g. actual past experience (claims, mortality, lapse) but original assumptions in the future, with all premiums at the original premium scale from inception.

Projections a-g can be separate tabs or combined into separate columns on the same exhibit.

4. For each of the four subsets of the business above, please provide the active life reserves balance as of the projection date on a nationwide basis.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned. Thank you.

*Sincerely,
Bill Dismore*

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Objection Letter

Objection Letter Status Info has been requested from company
 Objection Letter Date 08/11/2017
 Submitted Date 08/11/2017
 Respond By Date

Dear Peg VanDrisse,

Introduction:

The submission is *DISAPPROVED* and may not be used in the Commonwealth of Virginia.

A preliminary review of the submitted filing indicates the following concerns and questions. We'll continue our review of the submitted filing upon receipt of the following information.

Objection 1

- VA PremiumRates 30160A 32100, [30160A-VA] (Rate)
- VA PremiumRates 30160A 32100, [32100] (Rate)
- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: According to the Actuarial Memorandum, this filing applies to form 30160A -VA with the endorsement 32100.

Since rates would be tied to the policy and not specific to the endorsement, please revise the Affected Form Numbers in line one of the Rate/Rule Schedule to reflect 30160A-VA, 32100 and remove line item 2.

The premium rider form 30165A indicates a previous rate increase was approved under SERFF filing AERS-127792983. That filing also included form 30160A-VA without the endorsement. In regards to the policy with endorsement, the company provided the following explanation: "For applications received May 19, 2000 and later, policies were issued with a different set of rates and endorsement 32100, which changed the benefit trigger from 2 of 5 activities of daily living to 2 of 6 (bathing added as the sixth), provided for waiver of premium while receiving home care and allowed for a 20% spousal premium discount". And as noted in this filing, this increase only applies to 30160A-VA with the endorsement 32100.

There is some confusion, however, regarding the rates approved under the prior filing for 30165A. The rate attachments approved for both the rider and the policy reflect the same rates. Please clarify the following:

- 1) Are the rider rates a percentage factor of the base rates or separate dollar rates?
- 2) If dollar rates, did the premium actually increase 13% or were the rates actually factors applied to the base rate? Did the factors change at that time or stay the same?
- 3) When the rates for 30165A were approved under the prior filing, it appears this increase would have only been applicable to those 30160A-VA policies without the endorsement. Is that correct or was the rate increase to the rider applicable regardless if the policy did or did not have the endorsement attached?
- 4) The company has currently attached factors for 30165A in this filing. What were the factors before this rate increase? And how does this differ from the factors or rates for those policies without the endorsement? If the factors or rates are different depending upon if the endorsement is attached or not, please provide both sets of rates.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Objection 2

- VA PremiumRates 30160A 32100, [30160A-VA] (Rate)
- VA PremiumRates 30160A 32100, [32100] (Rate)
- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: Please update the Company Rate Information on the Rate/Rule Schedule to reflect the Overall Percentage Rate Impact and update the Percent Rate Change Request under the Rate Action Information to reflect the same percentage which is the percentage increase being requested at this time and not the previously approved increase.

According to the Cover Letter, the proposed increase is 32.3% on the base policy and all associated riders for form 30160A-VA with the 32100 endorsement. There is a range of 0% - 32.3% noted on the Rate/Rule Schedule. This is confirmed by Exhibit XIV which demonstrates a range of 0% - 32.3% with a premium cap of \$998.98 resulting no increases for some individuals. Since there is a range, the expectation is that the Overall Percentage rate impact and the proposed rate increase should fall between 0% - 32.3%. Please amend the filing accordingly.

There are two options included in the rate sheets: simple benefit increase option and compound benefit increase option. Are the premiums for these benefits a dollar amount or a percentage of the base policy? If these are form numbers separate from the base policy, please add the form numbers to the Rate/Rule Schedule and attach a factor or premium rate table for each. If not, please amend the rate attachment to indicate what those factors are on the premium attachment for the base policy.

Are there any other riders that would be affected by this rate increase? If so, please add the form number exactly as approved with a corresponding rate schedule.

Please update the Rate Request Summary for consistency with the affected form numbers and rate information on page 1.

Objection 3

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please provide the following:

- 1) Re-state the nationwide experience using Virginia approved rates.
- 2) Provide a separate calculation of the Lifetime Loss Ratio so that the historical premium component is restated to what it would be if the proposed premium had been charged (collected) since the forms introduction.
- 3) Please provide sufficient detail or documentation provided so that any projections can be recreated. Please provide a copy of all projections in Excel with working formulas.
- 4) Advise in what states the company has requested rate increases on this block, how the rate changes requested in Virginia compare with those requested in other states, and the current status of the reviews in other states.
- 5) Please provide a loss ratio projection reflecting the actual historical experience during the historical experience period and then, utilizing the actual inforce as of the projection date, projecting forward the expected earned premiums and incurred claims using the original pricing assumptions for interest, mortality, morbidity and persistency into the future and assuming the future premiums are paid based on the original premium scale as if no increases had ever been implemented.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

6) Please provide a loss ratio projection (both past and future) which reflects all of the original pricing assumptions for interest, mortality, morbidity, persistency and premium scale, but uses the actual distribution of policies as issued rather than the originally assumed mix of business.

7) Please provide the reserve basis and justification for the reserve levels provided.

8) If this increase is approved and experience develops as anticipated, will the company forgo increases in the future? If not, what would trigger a rate increase in the future? In other words, what targeted loss ratio does the company plans to manage this block in the future?

9) Please note for pre-stability policies, as set forth in 14VAC5-200-150 B, notwithstanding the provision of 14VAC5-130-50 with regard to interest, demonstrations of loss ratios shall be made in compliance with the Rules Governing the Filing of Rates for all Individual and Certain Group Accident and Sickness Insurance Policy Forms (14VAC5-130). All present and accumulated values used to determine rate increases, including the lifetime loss ratio used in the original pricing, shall use the maximum interest rate for contract reserves as specified in Section 38.2-1371 of the Code of Virginia. Please provide updated exhibits if appropriate.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the information noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

Thank you for your courtesy and consideration in this matter.

Sincerely,
Janet Houser

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/28/2020
Submitted Date	07/28/2020

Dear Bill Dismore,

Introduction:

This is in response to your comment letter dated 6/22/2020.

Response 1

Comments:

Policyholder Letter Review completed on 7/28/2020 in SERFF AERS-131005529.

Related Objection 1

Comments: The policyholder notification letter(s) are under review in SERFF AERS-131005529. The rate review process is pending the approval of the policyholder letter.

Please reply to this objection with, "Policyholder Letter Review completed on [Date] in SERFF AERS-131005529", once the company responds to the 6/22/2020 objection letter.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for your continued review of this filing.

Sincerely,

Lynn Blount

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
<hr/>					
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/25/2019
Submitted Date	11/25/2019

Dear Bill Dismore,

Introduction:

This is in response to your comment letter dated 10/1/2019.

Response 1

Comments:

Please see attached policyholder letters.

Related Objection 1

Applies To:

- Policyholder Notification Letter Samples (Supporting Document)*
- Response 5/6/2019 (Supporting Document)*

Comments: Please explain or clarify the statement in your objection response of 5/06/2019 in which the Company states that with a 40% rate increase, the company will pursue future rate increase at the end of the three-year rate guarantee period. The policyholder notification letter states in the third paragraph, under the section labeled, "Reasons for this increase"; "...we may request regulatory approval for additional premium increases in the state of Virginia in the future but not for at less three years." The response letter indicates that the Company "will" pursue additional rate increases, while the policyholder notification letter indicates that the company "may" pursue additional increases.

Describe the triggers that will prompt the Company to request additional rate increases and explain how this is communicated to the policyholder.

Changed Items:

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Supporting Document Schedule Item Changes	
Satisfied - Item:	Policyholder Notification Letter Samples
Comments:	
Attachment(s):	115743 - John Doe (SP NonWP)_30160A_32100.20191125.pdf 115744 - John Doe (SP WP)_30160A_32100.20191125.pdf 115746 - John Doe (Change Form)_30160A_32100.20191125.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Policyholder Notification Letter Samples</i>
Comments:	
Attachment(s):	<i>112016 VA LTC Waiver Policyholder Notification Letter.pdf 112018 VA LTC Non-Waiver Policyholder Notification Letter.pdf</i>

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 2

Comments:

Please see attached policyholder letters.

Related Objection 2

Applies To:

- Policyholder Notification Letter Samples (Supporting Document)

Comments: Please provide "John Doe" letters for both the Waiver and Non-Waiver Policyholder Notification letters without the bracketed language. The BOI would like to see the letter as it will appear to a policyholder. Include one letter that includes a policy with the nonforfeiture endorsement form 32100.

Changed Items:

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Supporting Document Schedule Item Changes	
Satisfied - Item:	Policyholder Notification Letter Samples
Comments:	
Attachment(s):	115743 - John Doe (SP NonWP)_30160A_32100.20191125.pdf 115744 - John Doe (SP WP)_30160A_32100.20191125.pdf 115746 - John Doe (Change Form)_30160A_32100.20191125.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Policyholder Notification Letter Samples</i>
Comments:	
Attachment(s):	<i>112016 VA LTC Waiver Policyholder Notification Letter.pdf 112018 VA LTC Non-Waiver Policyholder Notification Letter.pdf</i>

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for your continued review of this filing.

Sincerely,
Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/06/2019
Submitted Date	05/07/2019

Dear Bill Dismore,

Introduction:

This is in response to your comment letter dated 4/12/2019.

Response 1

Comments:

Please see attached response letter.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)
- Response 12-12-18 and Response Attachments (Supporting Document)

Comments: 1) In your response of 12/12/2018, the Company states that they can actuarially justify a much larger rate increase than the 40% requested. Please provide a detailed explanation of the Company's plans for future rate increase if the 40% rate increase were approved. Provide a description of the lifetime loss ratio to which the Company will manage this block of business going forward and what would trigger a request for an additional rate increase.

2) If the 40% rate increase were to be approved, the VA Cumulative Rate Increase would equal 86% while the nationwide increase is 68%. Please provide an explanation for this discrepancy in support of the Company's 40% rate increase request compared to a lesser increase of 26% which would bring the VA cumulative increase in line with the nationwide cumulative increase.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response 5/6/2019
Comments:	
Attachment(s):	VA Response_30160A_32100.20190506.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Conclusion:

Thank you for your continued review of this filing.

Sincerely,

Lynn Blount

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/17/2018
Submitted Date	12/17/2018

Dear Bill Dismore,

Introduction:

This letter is in response to your request dated 12-17-18 for additional information under the supporting documentation tab.

Response 1

Comments:

This rider rate schedule has been removed from the Rate/Rule tab and moved to the Supporting Documentation tab as requested.

Related Objection 1

Applies To:

- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: Rate/Rule Schedule

Thank you for your prompt response to our objections received on 12/14/18. Since the rider form 30165A was previously approved under SERFF # AERS-129718202 and there are no changes to percentage of premium on the schedule, please remove the rider rate schedule from the Rate/Rule tab and place it under the Supporting Documentation tab.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA Percentage of Premium of Rider Form 30165A
Comments:	As this was previously approved and there are no changes to the percentage of premium on the schedule, we have moved this rider rate schedule as instructed from the Rate/Rule tab and placed it under Supporting Documentation.
Attachment(s):	VA Percentage of Premium Rider Form 30165A.20170802.pdf

No Form Schedule items changed.

SERFF Tracking #:

AERS-131005512

State Tracking #:

AERS-131005512

Company Tracking #:

30160A-VA, 32100 2017

State: Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Long Term Care

Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Rate/Rule Schedule Item Changes

Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	withdrawn/under supporting documentation tab	30165A	Other	Previous State Filing Number: AERS-127792983 Rate Action Other Explanation: X% or the premium where the % rate is the same as at the time the policy was originally issued		12/17/2018 By: Peg VanDrisse
<i>Previous Version</i>						
1	VA Percentage of Premium Rider Form 30165A	30165A	Other	Previous State Filing Number: AERS-127792983 Rate Action Other Explanation: X% or the premium where the % rate is the same as at the time the policy was originally issued	VA Percentage of Premium Rider Form 30165A.20170802.pdf,	08/03/2017 By: Peg VanDrisse

Conclusion:

Thank you for your continued consideration of this filing. Please let me know if there are any other questions or I can be of further assistance to move this submission forward.

Sincerely,

Peg VanDrisse

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/14/2018
Submitted Date	12/14/2018

Dear Bill Dismore,

Introduction:

This is in response to your comment letter dated 12/13/2018.

Response 1

Comments:

Please see the attached approval for form 30165A, Non-forfeiture Benefit Rider. This was approved prior to SERFF, Virginia stamped approval 10/2/1997. The last rate filing that 30165A was filed was under SERFF tracking number AERS-129718202, closed-approved and filed on 4/6/2017.

Related Objection 1

Applies To:

- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: Please provide the SERFF tracking # for the approval of this rider form and rate (30165A). We could not find this form under the provided Previous State Filing Number: AERS-127792983.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	30165A Approval
Comments:	
Attachment(s):	VA 30165A 10-2-97 Apprvl.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

If there is additional information needed please let us know. We thank you for your continued review of this filing.

Sincerely,

Lynn Blount

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
<hr/>					
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/13/2018
Submitted Date	12/13/2018

Dear Bill Dismore,

Introduction:

This is in response to your comment letter dated 10/23/18.

Response 1

Comments:

Please see attached response with response attachments, a new actuarial memorandum and exhibits, checklist, request summary, and new premium rate tables.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)*

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
<hr/>					
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Comments: 1.Please provide the overall A/E ratio for lapses under current assumptions for this block of business.

2.For all projections requested in the next question, the baseline should comply with the following:

a.Any limited-pay paid-up policies should be removed, both from historical experience and future projections.

b.For this pre-stability block, assumptions should be best-estimate, without margins for moderately adverse conditions.

c.Premiums should be at the Virginia rate level for both historical and projected future.

d.Please use the appropriate average maximum valuation interest rate for each product series for accumulation and discounting of this block as specified in 14VAC5-200-150.

e.Please ensure that the discount/accumulation formulas are working formulas and specify the interest rates used in each exhibit.

3.Because the Bureau has observed over the years that there is often internal subsidization occurring between policyholders with different policy characteristics, for each of the four subsets of the business corresponding to the combinations of (limited/lifetime benefit periods) and (without/with inflation protection), please provide (in Excel format) the following projections on a nationwide basis:

a.current assumptions and current rates

b.current assumptions and current rates, including paid-up policies (if any)

c.current assumptions with the proposed rate increase

d.current assumptions with the proposed rate increase, but with no shock lapses, benefit reductions, CBUL, or adverse selection (if applicable)

e.current assumptions with premiums restated as if the proposed rate schedule had been in effect from inception

f.original assumptions and original premiums from inception with the actual distribution of business sold

g.actual past experience (claims, mortality, lapse) but original assumptions in the future, with all premiums at the original premium scale from inception.

Projections a-g can be separate tabs or combined into separate columns on the same exhibit.

4.For each of the four subsets of the business above, please provide the active life reserves balance as of the projection date on a nationwide basis.

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
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State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA Revised Rate Revision Checklist_30160A_32100.20181212.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Product Checklist</i>
Comments:	
Attachment(s):	<i>VA Rate Revision Checklist_30160A_32100_20170802.pdf</i>

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA Revised Rate Revision Checklist_30160A_32100.20181212.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Product Checklist</i>
Comments:	
Attachment(s):	<i>VA Rate Revision Checklist_30160A_32100_20170802.pdf</i>
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised Actuarial Memorandum_30160A_32100.20181212.pdf VA Actuarial Memorandum Exhibits_30160A_32100.20181212.xlsx
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA Actuarial Memorandum Exhibits_30160A_32100.20180712.xlsx</i> <i>VA Exhibits for Revised Actuarial Memorandum_30160A_32100.20180712.pdf</i> <i>VA Revised Actuarial Memorandum_30160A_32100.20180712.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA ActMem_30160A_32100_20170802.pdf</i>

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA Revised Rate Revision Checklist_30160A_32100.20181212.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Product Checklist</i>
Comments:	
Attachment(s):	<i>VA Rate Revision Checklist_30160A_32100_20170802.pdf</i>
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised Actuarial Memorandum_30160A_32100.20181212.pdf VA Actuarial Memorandum Exhibits_30160A_32100.20181212.xlsx
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA Actuarial Memorandum Exhibits_30160A_32100.20180712.xlsx</i> <i>VA Exhibits for Revised Actuarial Memorandum_30160A_32100.20180712.pdf</i> <i>VA Revised Actuarial Memorandum_30160A_32100.20180712.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA ActMem_30160A_32100_20170802.pdf</i>
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA Revised Long Term Care Insurance Rate Request Summary_30160A_32100.20181212.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Long Term Care Insurance Rate Request Summary</i>
Comments:	
Attachment(s):	<i>VA Long Term Care Insurance Rate Request Summary_30160A_32100.20180712.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Long Term Care Insurance Rate Request Summary</i>
Comments:	

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				
Attachment(s):	VA Long Term Care Insurance Rate Request Summary_30160A_32100_20170802.pdf				

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA Revised Rate Revision Checklist_30160A_32100.20181212.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Product Checklist</i>
Comments:	
Attachment(s):	<i>VA Rate Revision Checklist_30160A_32100_20170802.pdf</i>
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised Actuarial Memorandum_30160A_32100.20181212.pdf VA Actuarial Memorandum Exhibits_30160A_32100.20181212.xlsx
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA Actuarial Memorandum Exhibits_30160A_32100.20180712.xlsx VA Exhibits for Revised Actuarial Memorandum_30160A_32100.20180712.pdf VA Revised Actuarial Memorandum_30160A_32100.20180712.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA ActMem_30160A_32100_20170802.pdf</i>
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA Revised Long Term Care Insurance Rate Request Summary_30160A_32100.20181212.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Long Term Care Insurance Rate Request Summary</i>
Comments:	
Attachment(s):	<i>VA Long Term Care Insurance Rate Request Summary_30160A_32100.20180712.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Long Term Care Insurance Rate Request Summary</i>
Comments:	

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Attachment(s):	VA Long Term Care Insurance Rate Request Summary_30160A_32100_20170802.pdf
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Satisfied - Item:	Response 12-12-18 and Response Attachments
Comments:	
Attachment(s):	VA Response_30160A_32100.20181212.pdf VA Response Attachments_30160A_32100.20181212.xlsx

No Form Schedule items changed.

Rate/Rule Schedule Item Changes						
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	VA PremiumRates 30160A_32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 40	VA PremiumRates_30160A_32100.20181212.pdf	12/13/2018 By: Lynn Blount
Previous Version						
1	VA PremiumRates 30160A 32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 32.3	VA PremiumRates_30160A_32100_20170802.pdf	07/13/2018 By: Peg VanDrisse
Previous Version						
1	VA PremiumRates 30160A 32100	30160A-VA	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 10	VA PremiumRates_30160A_32100_20170802.pdf	08/03/2017 By: Peg VanDrisse

Conclusion:

Thank you for your continued review of this filing and we apologize for the late response. Any questions please let us know.

Sincerely,
Lynn Blount

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
<hr/>					
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/12/2018
Submitted Date	07/13/2018

Dear Bill Dismore,

Introduction:

This letter is in response to your letter dated 8-11-2017.

Response 1

Comments:

Please see our response letter and attachments.

Note we have withdrawn line 2 endorsement form 32100 and moved it to line 1 so both the form 30160A and 32100 are on the same line as requested. SERFF does not allow us to remove a line.

The overall percentage rate impact value will be provided through a post submission update.

Please see our response for clarification regarding rider form 30165A. Accordingly, no change was made under the Rate/Rule Schedule.

Related Objection 1

Applies To:

- VA PremiumRates 30160A 32100, [30160A-VA] (Rate)*
- VA PremiumRates 30160A 32100, [32100] (Rate)*
- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)*

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Comments: According to the Actuarial Memorandum, this filing applies to form 30160A -VA with the endorsement 32100. Since rates would be tied to the policy and not specific to the endorsement, please revise the Affected Form Numbers in line one of the Rate/Rule Schedule to reflect 30160A-VA, 32100 and remove line item 2.

The premium rider form 30165A indicates a previous rate increase was approved under SERFF filing AERS-127792983. That filing also included form 30160A-VA without the endorsement. In regards to the policy with endorsement, the company provided the following explanation: "For applications received May 19, 2000 and later, policies were issued with a different set of rates and endorsement 32100, which changed the benefit trigger from 2 of 5 activities of daily living to 2 of 6 (bathing added as the sixth), provided for waiver of premium while receiving home care and allowed for a 20% spousal premium discount". And as noted in this filing, this increase only applies to 30160A-VA with the endorsement 32100.

There is some confusion, however, regarding the rates approved under the prior filing for 30165A. The rate attachments approved for both the rider and the policy reflect the same rates. Please clarify the following:

- 1) Are the rider rates a percentage factor of the base rates or separate dollar rates?*
- 2) If dollar rates, did the premium actually increase 13% or were the rates actually factors applied to the base rate? Did the factors change at that time or stay the same?*
- 3) When the rates for 30165A were approved under the prior filing, it appears this increase would have only been applicable to those 30160A-VA policies without the endorsement. Is that correct or was the rate increase to the rider applicable regardless if the policy did or did not have the endorsement attached?*
- 4) The company has currently attached factors for 30165A in this filing. What were the factors before this rate increase? And how does this differ from the factors or rates for those policies without the endorsement? If the factors or rates are different depending upon if the endorsement is attached or not, please provide both sets of rates.*

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Response letter and attachments
Comments:	
Attachment(s):	VA Response_30160A_32100.20180712.pdf VA Response Attachments_30160A_32100.20180712.xlsx

State: Virginia Filing Company: RiverSource Life Insurance Company
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
 Product Name: Long Term Care
 Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

No Form Schedule items changed.

Rate/Rule Schedule Item Changes						
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	withdrawn/combined in line one	32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 32.3		07/13/2018 By: Peg VanDrisse
Previous Version						
1	VA PremiumRates 30160A 32100	32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 10	VA PremiumRates_30160A_32100_20170802.pdf,	08/03/2017 By: Peg VanDrisse
2	VA PremiumRates 30160A 32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 32.3	VA PremiumRates_30160A_32100_20170802.pdf,	07/13/2018 By: Peg VanDrisse
Previous Version						
2	VA PremiumRates 30160A 32100	30160A-VA	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 10	VA PremiumRates_30160A_32100_20170802.pdf,	08/03/2017 By: Peg VanDrisse

Response 2

Comments:

The Rate Action Information has been revised to reflect the amount of increase currently being requested. Please see the comment letter under Objection 1 for the responses regarding 3-5 under this Objection 2.

Related Objection 2

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Applies To:

- VA PremiumRates 30160A 32100, [30160A-VA] (Rate)
- VA PremiumRates 30160A 32100, [32100] (Rate)
- VA Percentage of Premium Rider Form 30165A, [30165A] (Rate)

Comments: Please update the Company Rate Information on the Rate/Rule Schedule to reflect the Overall Percentage Rate Impact and update the Percent Rate Change Request under the Rate Action Information to reflect the same percentage which is the percentage increase being requested at this time and not the previously approved increase.

According to the Cover Letter, the proposed increase is 32.3% on the base policy and all associated riders for form 30160A-VA with the 32100 endorsement. There is a range of 0% - 32.3% noted on the Rate/Rule Schedule. this is confirmed by Exhibit XIV which demonstrates a range of 0% - 32.3% with a premium cap of \$998.98 resulting no increases for some individuals. Since there is a range, the expectation is that the Overall Percentage rate impact and the proposed rate increase should fall between 0% - 32.3%. Please amend the filing accordingly.

There are two options included in the rate sheets: simple benefit increase option and compound benefit increase option. Are the premiums for these benefits a dollar amount or a percentage of the base policy? If these are form numbers separate from the base policy, please add the form numbers to the Rate/Rule Schedule and attach a factor or premium rate table for each. If not, please amend the rate attachment to indicate what those factors are on the premium attachment for the base policy.

Are there any other riders that would affected by this rate increase? If so, please add the form number exactly as approved with a corresponding rate schedule.

Please update the Rate Request Summary for consistency with the affected form numbers and rate information on page 1.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA Long Term Care Insurance Rate Request Summary_30160A_32100.20180712.pdf
<i>Previous Version</i>	
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA Long Term Care Insurance Rate Request Summary_30160A_32100_20170802.pdf

No Form Schedule items changed.

State: Virginia Filing Company: RiverSource Life Insurance Company
 TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
 Product Name: Long Term Care
 Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Rate/Rule Schedule Item Changes						
Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	withdrawn/combined in line one	32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 32.3		07/13/2018 By: Peg VanDrisse
<i>Previous Version</i>						
1	VA PremiumRates 30160A 32100	32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 10	VA PremiumRates_30160A_32100_20170802.pdf,	08/03/2017 By: Peg VanDrisse
2	VA PremiumRates 30160A 32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 32.3	VA PremiumRates_30160A_32100_20170802.pdf,	07/13/2018 By: Peg VanDrisse
<i>Previous Version</i>						
2	VA PremiumRates 30160A 32100	30160A-VA	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 10	VA PremiumRates_30160A_32100_20170802.pdf,	08/03/2017 By: Peg VanDrisse

Response 3

Comments:

Please see the attached revised actuarial memo and exhibits.

Related Objection 3

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
<hr/>					
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Comments: Please provide the following:

- 1) Re-state the nationwide experience using Virginia approved rates.
- 2) Provide a separate calculation of the Lifetime Loss Ratio so that the historical premium component is restated to what it would be if the proposed premium had been charged (collected) since the forms introduction.
- 3) Please provide sufficient detail or documentation provided so that any projections can be recreated. Please provide a copy of all projections in Excel with working formulas.
- 4) Advise in what states the company has requested rate increases on this block, how the rate changes requested in Virginia compare with those requested in other states, and the current status of the reviews in other states.
- 5) Please provide a loss ratio projection reflecting the actual historical experience during the historical experience period and then, utilizing the actual inforce as of the projection date, projecting forward the expected earned premiums and incurred claims using the original pricing assumptions for interest, mortality, morbidity and persistency into the future and assuming the future premiums are paid based on the original premium scale as if no increases had ever been implemented.
- 6) Please provide a loss ratio projection (both past and future) which reflects all of the original pricing assumptions for interest, mortality, morbidity, persistency and premium scale, but uses the actual distribution of policies as issued rather than the originally assumed mix of business.
- 7) Please provide the reserve basis and justification for the reserve levels provided.
- 8) If this increase is approved and experience develops as anticipated, will the company forgo increases in the future? If not, what would trigger a rate increase in the future? In other words, what targeted loss ratio does the company plans to manage this block in the future?
- 9) Please note for pre-stability policies, as set forth in 14VAC5-200-150 B, notwithstanding the provision of 14VAC5-130-50 with regard to interest, demonstrations of loss ratios shall be made in compliance with the Rules Governing the Filing of Rates for all Individual and Certain Group Accident and Sickness Insurance Policy Forms (14VAC5-130). All present and accumulated values used to determine rate increases, including the lifetime loss ratio used in the original pricing, shall use the maximum interest rate for contract reserves as specified in Section 38.2-1371 of the Code of Virginia. Please provide updated exhibits if appropriate.

Changed Items:

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Supporting Document Schedule Item Changes	
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Actuarial Memorandum Exhibits_30160A_32100.20180712.xlsx VA Exhibits for Revised Actuarial Memorandum_30160A_32100.20180712.pdf VA Revised Actuarial Memorandum_30160A_32100.20180712.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>L&H Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>VA ActMem_30160A_32100_20170802.pdf</i>

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Thank you for your continued consideration of this filing. Please let me know if there is any other information you need to move this filing forward.

Sincerely,

Peg VanDrisse

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Amendment Letter

Submitted Date: 09/12/2018

Comments:

As per our conversation on 9/11/2018, we have provided the Statements of Variability for forms; 112016, 112018, 112459 and 291524. Below are the SERFF tracking numbers and disposition dates for the above forms noted above.

1. Policyholder Notification Letter (112016 VA Waiver and 112018 VA Non-waiver) – AERS-129718202; Disposition Date 4/6/2017.
2. 112459 VA LTC Endorsement - AERS-129718202; Disposition Date 4/6/2017.
3. 291524 VA LTC Coverage Change Request Form – AERS-128075059; Disposition Date 5/01/2012.

If anything further is needed please do not hesitate to call.

Thank you.

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Statements of Variability
Comments:	
Attachment(s):	SOV 291524-VA.pdf SOV VA LTC Endorsement 112459.pdf SOV VA LTC PlcyholderLtrs 112016 112018.pdf

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Filer

Created By:

Bill Dismore on 07/14/2020 10:43 AM

Last Edited By:

Bill Dismore

Submitted On:

07/14/2020 10:44 AM

Subject:

Extension granted to respond by 7/27/2020

Comments:

Extension from 7/22/ to 7/27/2020 granted.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 07/14/2020 08:11 AM

Last Edited By:

Bill Dismore

Submitted On:

07/14/2020 10:44 AM

Subject:

Extension Request

Comments:

We respectfully request an extension to 7/27/2020 to respond to the comment letter dated 6/22/2020.

Sincerely,
Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Filer

Created By:

Bill Dismore on 05/22/2020 10:49 AM

Last Edited By:

Bill Dismore

Submitted On:

06/22/2020 01:28 PM

Subject:

Status Request

Comments:

The policyholder letter has been submitted to BOI Management for approval. I will be able to proceed with the final review once their review is completed.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Note To Reviewer

Created By:

Lynn Blount on 05/22/2020 08:41 AM

Last Edited By:

Bill Dismore

Submitted On:

06/22/2020 01:28 PM

Subject:

Status Request

Comments:

We are taking the opportunity to follow up on the status of the filing. We appreciate any updates on the timeframe for reviewing.

Thank you,
Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Filer

Created By:

Bill Dismore on 04/03/2020 11:22 AM

Last Edited By:

Bill Dismore

Submitted On:

04/03/2020 11:22 AM

Subject:

Status Request

Comments:

Rate revisions have been reviewed and accepted as justified by the Commissioner. The only remaining item is the review of the policyholder notification letter by Management. It is currently on the list for their review. As soon as I receive their feedback on the letter filed under AERS-131005529 I will be in touch with you. Thank you for your patience.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Note To Reviewer

Created By:

Lynn Blount on 04/03/2020 09:53 AM

Last Edited By:

Bill Dismore

Submitted On:

04/03/2020 11:22 AM

Subject:

Status Request

Comments:

We are taking the opportunity to follow up on the status of the filing. We appreciate any updates on the timeframe for reviewing.

Thank you,
Lynn Blount

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Note To Filer

Created By:

Bill Dismore on 11/14/2019 07:14 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Extension Granted

Comments:

Extension granted to 11/25/2019.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 11/13/2019 08:24 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Extension Request

Comments:

We are still working on our response and respectfully request an extension to 11/25/2019 to respond to the comment letter dated 10/01/2019.

Any questions please let me know.

Thank you,

Lynn Blount

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Note To Filer

Created By:

Bill Dismore on 09/12/2019 02:10 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

Thank you for your status request. The filing has been referred to Management for review and possible approval. We are working to get these filings reviewed as soon as possible.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 09/12/2019 11:44 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

We understand there has been a delay in reviewing due to ACA filings. We are taking the opportunity to follow up on the status of this filing, as the deemer date was 8/28/2019 . We appreciate any updates on the timeframe for reviewing.

Thank you,

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Filer

Created By:

Bill Dismore on 07/29/2019 09:36 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

Due to ACA Healthcare filings which must be finalized by 8/21/2019, Management has not had the opportunity to review this filing. Thank you for your continued patience.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 07/29/2019 08:41 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

We are taking the opportunity to follow up on the status of the filing as it has a deemer date of 7/13/2019. We appreciate any updates on the timeframe for reviewing.

If there is additional information needed please let us know.

Thank you,

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Filer

Created By:

Bill Dismore on 06/14/2019 12:42 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

This filing is currently under further review at management level. We will respond with additional information as soon as possible. Thank you.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 06/13/2019 03:17 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

We are taking the opportunity to follow up on the status of the filing. We appreciate any updates on the timeframe for reviewing.

If there is additional information needed please let us know.

Thank you.

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Filer

Created By:

Bill Dismore on 02/27/2019 02:10 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

Due to changes in our rate analysis process, this filing is currently under further review at management level. We will respond with additional information as soon as possible. Thank you.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Note To Reviewer

Created By:

Lynn Blount on 02/26/2019 01:54 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Status Request

Comments:

We are taking the opportunity to follow up on the status of the filing. We appreciate any updates on the timeframe for reviewing.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 12/11/2018 03:32 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Response Due

Comments:

Apologies on reaching out to you now and the late response. The actuary will have a response to submit Wednesday, 12/12/18.

Any questions or issues please let me know.
(612) 671-6646

Sincerely,

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 12/06/2018 01:57 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Extension Request

Comments:

I apologize for my long message. I was hoping to reach you by phone to extend out until Monday, December 10th. We apologize for any inconvenience this may be causing.

Sincerely,

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 11/27/2018 11:59 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Extension Request

Comments:

We respectfully request an extension to 12/7/2018 to respond to the comment letter dated 10/23/2018.

Best Regards,

Lynn Blount

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Note To Filer

Created By:

Bill Dismore on 11/13/2018 02:08 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Amended Filing

Comments:

Yes, you can amend the filing but understand that all supporting documentation and proposed rate sheets will also need to be amended.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 11/13/2018 01:54 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Question

Comments:

We are in the process of finalizing the response to your October 23, 2018 objection and plan to submit it no later than the November 28, 2018 due date. Since the time of the original submission in August 2017, emerging experience on this block of business indicates a much higher premium rate increase is supportable. If the Department will allow it, the company would like to revise the current premium rate increase filing to request a 40% premium rate increase for all policies, providing updated experience to support the higher requested premium rate increase. Along with a revised Actuarial Memorandum with updated experience, we will provide updated experience for the attachments to my July 12, 2018 response as well as responses to the October 23, 2018 objection.

Sincerely,

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Note To Reviewer

Created By:

Lynn Blount on 09/12/2018 08:29 AM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Statements of Variability and tracking numbers

Comments:

Mr. Smith, per our conversation I have added the SOV's and tracking numbers.

Please let me know if any additional information is needed.

Stay safe from the rain/hurricane.

Sincerely,

Lynn Blount

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Reviewer Note

Created By:

Bill Dismore on 10/26/2020 09:51 AM

Last Edited By:

Bill Dismore

Submitted On:

10/26/2020 09:53 AM

Subject:

Actuarial Final Summary & Opinion Report

Comments:

ARC submitted their final summary report on 1/3/2019.

January 11, 2019

Life and Health Division
Bureau of Insurance
State Corporation Commission
P. O. Box 1157
Richmond, VA 23218

Subject: **SERFF Tracking #AERS-131005512**

At the request of the Virginia SCC Bureau of Insurance (the “Bureau”), I have reviewed the filing for the above captioned submission from **Riversource Life Insurance Company** (the “Company”). This is a rate increase filing for a block of Individual Long Term Care Insurance.

Recommendation

My review of this filing was performed according to the provisions of 14VAC5-200-150. Applicable Actuarial Standards of Practice were considered, including Actuarial Standard of Practice No. 18, “Long-Term Care Insurance” and Actuarial Standard of Practice No. 8, “Regulatory Filings for Rates and Financial Projections for Health Plans”. After review of the Company’s submission, I believe that the Company has demonstrated compliance with the laws and regulations.

Other Considerations

The Bureau may wish to consider the following policy item:

- The cumulative increase will be higher in Virginia than nationwide if the full increase is granted.

Historical Background

These forms were issued in Virginia from July 2000 through June 2003 and include 1,501 pre-stability policies as of 6/30/2018. The Bureau has approved three previous rate increases: 10% in 2007, 10% in 2011, and 10% in 2011. The Company is now requesting a rate increase of 40%, for a cumulative increase of 86%. Since the Company is capping the rates at 999.98 per unit at the advanced attained ages, the average increase is 32.2%.

Requests were sent to the Company for additional information and the Company’s responses clarified issues which arose during the course of my review. The Bureau was involved in all correspondence with the Company.

Methodology

My approach was to a) review the submitted filing materials, b) check the filing contents and assumptions for compliance with all relevant regulations, c) verify the calculations in the supplied exhibits, d) review the projections for reasonableness, and e) analyze the current increase and cumulative increase in Virginia relative to other states.

Assumptions

Morbidity – The current morbidity assumptions for claim costs is based on the original assumptions with morbidity A/E factors applied based on the Company’s experience through 2017. The original assumptions were based on the 1985 NNHS and actuarial judgment. The A/E based on the revised assumptions is 100%.

Credibility was determined based on the formula recommended by the American Academy of Actuaries (“AAA”) in a Long-term Care Credibility Monograph issued in August 2016. Under the formula recommended, 3,246 claims are needed for full LTCI data credibility. The standard is applied to cumulative historical experience to determine the credibility of the block. The Company’s morbidity is based on 3,652 claims, resulting in full credibility.

Mortality – The assumed mortality is the 1983 IAM table with factors based on Company experience through 2017, varying by issue age and duration. The original mortality was the 1983 IAM table. The current mortality produces an A/E ratio of 100%.

Voluntary Lapse –The current lapse assumptions are based on Company experience through 2017, varying by issue age, benefit type and duration. They fit reasonably well with the actual historical experience (100% A/E overall). The current lapse rates dip to a range of 0.56% to 1.7% at their minimum, but then gradually increase as attained age advances (1.1% to 2.5% depending on issue age and benefit period). The year 6+ assumption was 3.0% to 5.0% under the original assumption.

Interest – the average maximum valuation interest rate of 4.5% is used for discounting the projections.

Policyholder Behavior

Adverse morbidity selection factors are applied for six years following the increase. An additional 1.5% of inforce policyholders is assumed to lapse due to the increase, and a 2.7% reduction in benefits due to election of reduced benefit options is also assumed.

Projections

Lifetime Loss Ratio

The loss ratio projections as of 6/30/2018 are summarized below. Note that the past premiums make up approximately 76% of the total PV of premium for this block.

Benefit Period	Inflation	Original LR	No Increase			With Increase			From Inception
			Future	Fut/ALR	Lifetime	Future	Fut/ALR	Lifetime	
Limited	None	54%	242%	136%	91%	168%	92%	86%	54%
Lifetime	None	65%	318%	201%	111%	219%	136%	102%	67%
Limited	Auto	61%	307%	137%	97%	211%	91%	87%	60%
Lifetime	Auto	67%	389%	211%	128%	266%	139%	112%	79%

60/80 Test

1a Accumulated value of past earned premiums	1,311,019,308	63.6%	833,174,722
1b Present value of future projected earned premiums at current level	421,300,267	63.6%	267,743,374
2 Present value of increased portion of future projected earned premiums	128,746,174	80.0%	102,996,939
3 Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2	1,861,065,749		1,203,915,035
4 Lifetime Incurred Claims with Rate Increase			1,859,354,581
5 Test: 4 is not less than 3			PASS

PV of Future Loss Test

The goal of this test is to ensure that, when looking only into the future, the company is not in a better position financially than if the assumptions were to play out according to original assumptions (except for interest). This is done by calculating the present value of the future expected loss under original assumptions and comparing that to the current assumptions with and without the proposed premium action. For this filing, the loss is greater under the current assumptions than original assumptions, so this test would not limit the increase.

Benefit Period	Inflation	Original	Current	Proposed	Limit
Limited	None	(2.7)	(11.7)	(7.9)	40%
Lifetime	None	(2.6)	(12.7)	(9.7)	40%
Limited	Auto	(143.2)	(447.9)	(338.1)	40%
Lifetime	Auto	(134.1)	(550.7)	(444.1)	40%

State Rate Equity

NW Range	NW Avg	NW Prop	VA Curr	VA Prop
0%-80%	59%	68%	33%	86%

The increase is significantly higher than the nationwide average will be even if all pending increases are approved. If the Bureau wants to cap the Virginia cumulative increase at the proposed nationwide average of 68%, it would need to ask the Company to reduce its request from 40% to 26%.

Reliance and Qualifications

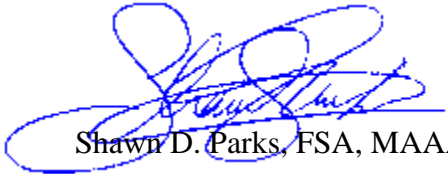
I am providing this letter to the Bureau as the sole intended user. The scope of the review relates only to compliance with applicable laws and regulations relating to the actuarial aspects of the filing under consideration, and the intended purpose is to communicate my findings regarding this filing. Distribution of this letter to parties other than the Bureau by me or any other party does not constitute advice by me to those parties. The reliance of parties other than the Bureau on any aspect of this work is not authorized by me and is done at their own risk.

In arriving at my opinion, I used and relied on information provided by the Company and the Bureau without independent investigation or verification. If this information is inaccurate, incomplete, or out of date, my findings and conclusions may need to be revised. While I have relied on the data provided without independent investigation or verification, I have reviewed the data for consistency and reasonableness. In the event that I found the data inconsistent or unreasonable, I have requested clarification.

I am a member of the American Academy of Actuaries and meet that body's Qualification Standards to render this opinion. I am responsible for this work and have utilized generally accepted actuarial methodologies in arriving at my opinion.

If you have any questions regarding this filing, please contact me to discuss.

Sincerely,



Shawn D. Parks, FSA, MAAA

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Reviewer Note

Created By:

Bill Dismore on 10/21/2019 02:42 PM

Last Edited By:

Bill Dismore

Submitted On:

04/02/2020 10:47 AM

Subject:

Call from Company

Comments:

Call from Company received today, request for extension as Company will file brand new policyholder letters for each filing. Extended to 11/15/2019.

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Reviewer Note

Created By:

Bill Dismore on 03/14/2019 01:24 PM

Last Edited By:

Bill Dismore

Submitted On:

10/26/2020 09:53 AM

Subject:

Rate Review - Co. Response to Objection on 5/06/2019

Comments:

3/14/2019 - email to Greg Smith advising that the rate review was completed and attached a copy of ARC's final summary report.

5/06/2019 - Requested Mgmt. evaluation of Company's objection letter response to objections.

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Reviewer Note

Created By:

Bill Dismore on 10/03/2018 07:24 AM

Last Edited By:

Bill Dismore

Submitted On:

10/26/2020 10:01 AM

Subject:

RRS

Comments:

Rate Review Summary

Long Term Care Insurance Rate Request Summary
Part 1 – To Be Completed By Company

Reset Form

Company Name and NAIC Number:	RiverSource Life Insurance Company, #65005
SERFF Tracking Number:	AERS-131005512
Effective Date:	Upon approval

Revised Rates

Average Annual Premium Per Member:	2,550
Average Requested Percentage Rate Change Per Member:	39.9
Minimum Requested Percentage Rate Change Per Member:	0.0%
Maximum Requested Percentage Rate Change Per Member:	40.0%
Number of Policy Holders Affected :	1,501

Plans Affected

(The Form Number and “Product Name”)

Form#	“Product Name”(if applicable)
30160A-VA, issued with Endorsement Form 32100	

Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for the revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company’s request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

Narrative: Explanation of Justification for Rate Increase

Rates are being raised on all policies issued under these policy forms to offset anticipated claims that are higher than previously expected. This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims. This premium increase is designed to offset some of these anticipated increased costs and in no way reflects on the integrity of an individual's policy, nor is it based on an individual's claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance and included the necessary actuarial data and other items requested by the Virginia Bureau of Insurance to support the increase.

Long Term Care Insurance Rate Request Summary Part 2 –To Be Completed by Bureau of Insurance

Company Name and NAIC Number: RiverSource Life Insurance Company - NAIC #: 65005

SERFF Tracking Number: AERS-131005512

Disposition: Approved

Approval Date: 10/26/2020

Revised Rates

Average Annual Premium Per Member: \$2,550

Average Requested Percentage Rate Change Per Member: 40.0%

Minimum Requested Percentage Rate Change Per Member: 0.0%

Maximum Requested Percentage Rate Change Per Member: 40.0%

Number of Policy Holders Affected: 1,501

Summary of the Bureau of Insurance's review of the rate request:

The Company requested, and the Bureau approved a rate increase of 40% for this block of individual long-term care insurance policy forms.

The filing was reviewed by the Bureau's consulting actuary and determined to comply with the requirements for a rate increase set forth in 14VAC5-200-150 of the Virginia Administrative Code for policies issued prior to October 1, 2003. The review indicated that the anticipated loss ratio, reflecting claims payout, will be 96.7% with the increase, which exceeds the minimum required loss ratio of 60%.

The Company has advised that they do intend to request a future rate increase on this block should the actual experience become worse than projected.

The primary reasons for the rate increase are that policyholders are living longer and keeping their policies in force longer, which has resulted in more claims being filed than the Company anticipated when the policy was originally priced. The Company determined that a premium increase is necessary to reflect that future claims are expected to be significantly higher on these policies than originally expected or priced and to ensure that sufficient funds are available to pay claims.

The Company is offering all policyholders options to reduce the premium increase by reducing their coverage. These reductions could be in the form of lower daily benefits, a shorter benefit period, a longer elimination period, the termination of riders or any combination of these reductions, or a paid-up policy. Specific options are included in the letter sent to all policyholders notifying them of the rate increase and can be discussed with the Company by calling its customer service department.

The filing can be reviewed on the Bureau's webpage under the Rate/Policy Form Search at:

<https://scc.virginia.gov/boi/SERFFInquiry/LtcFilings.aspx>

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Post Submission Update Request Processed On 07/13/2018

Status: Allowed
Created By: Peg VanDrisse
Processed By: Bill Dismore
Comments:

Company Rate Information:

Company Name:RiverSource Life Insurance Company

Field Name	Requested Change	Prior Value
Overall % Rate Impact	32.200%	

State: Virginia **Filing Company:** RiverSource Life Insurance Company
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Long Term Care
Project Name/Number: 30160A-VA, 32100 2017/30160A-VA, 32100 2017

Post Submission Update Request Processed On 12/13/2018

Status: Allowed
Created By: Lynn Blount
Processed By: Bill Dismore
Comments:

Company Rate Information:

Company Name: RiverSource Life Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	40.000%	194.400%
Overall % Rate Impact	40.000%	32.200%
Written Premium Change for this Program	\$1091101	\$904795
Number of Policy Holders Affected for this Program	1501	1535
Written Premium for this Program	\$2734228	\$2801222
Maximum %Change (where required)	40.000%	32.300%
Minimum %Change (where required)	40.000%	0.000%

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Rate Information

Rate data applies to filing.

Filing Method:	Review and Approve
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	10.000%
Effective Date of Last Rate Revision:	06/01/2015
Filing Method of Last Filing:	Review and Approve
SERFF Tracking Number of Last Filing:	

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
RiverSource Life Insurance Company	40.000%	40.000%	\$1,091,101	1,501	\$2,734,228	40.000%	40.000%

SERFF Tracking #:

AERS-131005512

State Tracking #:

AERS-131005512

Company Tracking #:

30160A-VA, 32100 2017

State:

Virginia

Filing Company:

RiverSource Life Insurance Company

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Long Term Care

Project Name/Number:

30160A-VA, 32100 2017/30160A-VA, 32100 2017

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		VA PremiumRates 30160A_32100	30160A-VA, 32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 40	VA PremiumRates_30160 A_32100.20181212.pdf
2		withdrawn/combined in line one	32100	Revised	Previous State Filing Number: AERS-129009910 Percent Rate Change Request: 32.3	
3		withdrawn/under supporting documentation tab	30165A	Other	Previous State Filing Number: AERS-127792983 Rate Action Other Explanation: X% or the premium where the % rate is the same as at the time the policy was originally issued	

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD																		
Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
41	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
42	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
43	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
44	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
45	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
46	104.36	119.26	134.18	85.70	98.78	111.80	169.60	192.86	216.16	152.80	173.32	193.78	231.06	259.02	286.98	208.72	232.94	257.16
47	106.24	122.06	137.90	87.58	101.58	115.52	178.90	203.14	227.34	158.40	179.84	201.24	240.40	269.28	298.14	216.16	242.26	268.32
48	106.24	122.06	137.90	91.34	105.30	119.26	186.34	212.44	238.50	162.12	183.56	204.98	253.42	283.24	313.04	221.76	248.78	275.78
49	111.80	128.60	145.34	93.18	108.08	122.98	190.06	216.16	242.26	163.96	186.34	208.72	262.76	293.50	324.24	229.20	256.22	283.24
50	111.80	128.60	145.34	96.90	111.80	126.70	195.66	222.68	249.70	167.72	190.06	212.44	281.40	314.02	346.58	234.78	262.76	290.70
51	115.52	134.18	152.80	98.78	114.60	130.46	201.24	229.20	257.16	177.04	200.32	223.60	288.84	321.46	354.06	240.40	269.28	298.14
52	119.26	137.90	156.52	98.78	114.60	130.46	204.98	232.94	260.88	177.04	200.32	223.60	298.14	331.68	365.24	251.58	280.48	309.32
53	121.12	140.70	160.24	108.08	124.86	141.62	210.58	239.48	268.32	182.62	206.86	231.06	307.46	341.94	376.40	257.16	286.98	316.80
54	121.12	140.70	160.24	108.08	124.86	141.62	219.88	249.70	279.52	186.34	210.58	234.78	320.52	355.94	391.32	262.76	293.50	324.24
55	126.70	147.22	167.72	115.52	134.18	152.80	225.48	256.22	286.98	193.78	219.88	245.98	333.56	369.90	406.22	273.92	306.54	339.14
56	136.06	157.48	178.90	119.26	137.90	156.52	240.40	273.00	305.60	206.86	233.86	260.88	354.06	391.32	428.60	294.42	327.96	361.50
57	149.08	171.44	193.78	128.60	148.14	167.72	257.16	290.70	324.24	223.60	251.58	279.52	370.84	409.02	447.22	314.94	349.38	383.86
58	158.40	181.70	204.98	137.90	158.40	178.90	270.20	304.66	339.14	236.66	265.56	294.42	393.20	433.28	473.32	331.68	367.10	402.50
59	167.72	191.94	216.16	147.22	168.68	190.06	290.70	326.12	361.50	253.42	283.24	313.04	413.68	454.66	495.66	352.22	388.56	424.84
60	182.62	208.72	234.78	156.52	178.90	201.24	303.74	340.08	376.40	273.92	306.54	339.14	430.48	472.38	514.30	368.96	406.22	443.50
61	191.94	218.96	245.98	163.96	186.34	208.72	320.52	357.78	395.06	290.70	324.24	357.78	450.94	493.80	536.64	389.48	427.68	465.86
62	201.24	229.20	257.16	169.60	192.86	216.16	337.28	375.48	413.68	303.74	338.22	372.68	467.74	511.54	555.30	411.82	451.90	491.94
63	210.58	239.48	268.32	182.62	206.86	231.06	355.94	396.00	436.04	320.52	355.94	391.32	488.20	532.92	577.66	428.60	469.58	510.58
64	223.60	253.42	283.24	193.78	219.88	245.98	368.96	409.94	450.94	333.56	369.90	406.22	508.74	554.38	600.02	449.10	491.00	532.92
65	236.66	269.28	301.86	203.14	230.14	257.16	391.32	434.20	477.04	355.94	394.12	432.32	531.08	578.62	626.10	467.74	511.54	555.30
66	277.68	312.12	346.58	236.66	265.56	294.42	452.82	498.46	544.12	406.22	447.22	488.20	603.74	654.08	704.36	527.36	574.90	622.38
67	324.24	361.50	398.78	281.40	314.02	346.58	516.18	565.54	614.94	460.26	504.08	547.84	678.28	732.34	786.36	585.12	635.44	685.72
68	368.96	409.94	450.94	316.80	352.22	387.58	577.66	629.84	682.00	516.18	563.70	611.18	747.24	804.08	860.88	644.72	698.80	752.80
69	419.28	463.10	506.86	355.94	394.12	432.32	637.28	693.20	749.08	573.92	624.26	674.54	827.34	888.86	950.34	702.52	759.34	816.18
70	464.02	511.54	559.02	393.20	435.12	477.04	700.64	760.26	819.90	626.10	680.14	734.18	900.04	964.32	999.98	756.54	816.18	875.82
71	505.00	554.38	603.74	430.48	474.26	518.02	764.00	827.34	890.70	678.28	734.18	790.08	968.96	999.98	999.98	816.18	879.54	942.88
72	555.30	607.46	659.66	467.74	515.26	562.74	825.50	891.66	957.80	736.06	794.76	853.44	999.98	999.98	999.98	873.96	940.10	999.98
73	600.02	655.92	711.82	506.86	557.18	607.46	888.86	958.74	999.98	788.22	850.66	913.08	999.98	999.98	999.98	933.58	999.98	999.98
74	642.88	701.60	760.26	544.12	598.16	652.20	950.34	999.98	999.98	842.26	907.48	972.70	999.98	999.98	999.98	991.34	999.98	999.98
75	695.08	757.48	819.90	587.00	643.80	700.64	999.98	999.98	999.98	901.88	970.84	999.98	999.98	999.98	999.98	999.98	999.98	999.98
76	750.96	820.84	890.70	635.44	699.72	764.00	999.98	999.98	999.98	970.84	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
77	810.60	887.94	965.24	683.88	755.60	827.34	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
78	866.48	951.30	999.98	732.34	811.52	890.70	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
79	926.12	999.98	999.98	780.78	867.42	954.08	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD																		
Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
41	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
42	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
43	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
44	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
45	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
46	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	152.80	171.44	190.06
47	87.58	101.58	115.52	74.54	85.70	96.90	130.46	149.08	167.72	108.08	122.98	137.90	184.50	207.78	231.06	158.40	177.96	197.52
48	87.58	101.58	115.52	76.42	88.50	100.64	136.06	155.60	175.16	113.68	129.52	145.34	188.22	211.52	234.78	162.12	181.70	201.24
49	89.44	104.36	119.26	76.42	88.50	100.64	143.50	163.04	182.62	117.40	133.26	149.08	193.78	218.04	242.26	171.44	191.94	212.44
50	93.18	108.08	122.98	81.98	95.06	108.08	149.08	169.60	190.06	122.98	139.78	156.52	197.52	221.76	245.98	180.76	202.22	223.60
51	95.06	110.88	126.70	81.98	95.06	108.08	154.68	176.12	197.52	122.98	139.78	156.52	204.98	231.06	257.16	184.50	205.94	227.34
52	95.06	110.88	126.70	81.98	95.06	108.08	158.40	179.84	201.24	126.70	143.50	160.24	212.44	238.50	264.60	190.06	212.44	234.78
53	96.90	113.68	130.46	83.86	97.86	111.80	163.96	186.34	208.72	134.18	152.80	171.44	218.04	245.06	272.04	193.78	216.16	238.50
54	96.90	113.68	130.46	83.86	97.86	111.80	169.60	192.86	216.16	141.62	160.24	178.90	221.76	248.78	275.78	199.38	222.68	245.98
55	104.36	122.98	141.62	89.44	104.36	119.26	178.90	203.14	227.34	147.22	166.80	186.34	227.34	255.30	283.24	212.44	236.66	260.88
56	111.80	130.46	149.08	93.18	108.08	122.98	190.06	216.16	242.26	156.52	177.04	197.52	240.40	269.28	298.14	223.60	249.70	275.78
57	121.12	140.70	160.24	98.78	114.60	130.46	199.38	226.40	253.42	165.88	187.30	208.72	257.16	286.98	316.80	236.66	263.68	290.70
58	130.46	150.94	171.44	108.08	124.86	141.62	216.16	244.14	272.04	182.62	204.98	227.34	277.68	308.40	339.14	253.42	281.40	309.32
59	136.06	157.48	178.90	119.26	137.90	156.52	225.48	254.38	283.24	191.94	215.24	238.50	292.58	325.20	357.78	266.48	295.38	324.24
60	149.08	171.44	193.78	124.86	144.42	163.96	238.50	268.32	298.14	208.72	232.94	257.16	313.04	346.58	380.12	283.24	313.04	342.86
61	156.52	178.90	201.24	128.60	148.14	167.72	251.58	282.32	313.04	219.88	245.98	272.04	326.12	360.58	395.06	296.30	327.04	357.78
62	162.12	185.42	208.72	137.90	158.40	178.90	262.76	295.38	327.96	229.20	256.22	283.24	339.14	374.56	409.94	314.94	347.54	380.12
63	171.44	195.66	219.88	147.22	168.68	190.06	275.78	309.32	342.86	245.98	273.92	301.86	359.66	396.00	432.32	327.96	361.50	395.06
64	186.34	212.44	238.50	152.80	175.16	197.52	288.84	323.32	357.78	255.30	284.20	313.04	376.40	413.68	450.94	344.74	379.20	413.68
65	195.66	222.68	249.70	162.12	185.42	208.72	303.74	340.08	376.40	270.20	300.94	331.68	396.92	437.00	477.04	357.78	393.20	428.60
66	225.48	254.38	283.24	190.06	216.16	242.26	344.74	384.80	424.84	313.04	346.58	380.12	450.94	493.80	536.64	396.92	435.12	473.32
67	259.02	291.64	324.24	219.88	247.86	275.78	391.32	434.20	477.04	355.94	392.28	428.60	505.00	552.52	600.02	439.76	482.64	525.48
68	288.84	323.32	357.78	242.26	272.04	301.86	434.20	479.84	525.48	396.92	437.00	477.04	559.02	609.34	659.66	486.36	532.00	577.66
69	320.52	357.78	395.06	275.78	309.32	342.86	475.18	524.56	573.92	437.92	479.84	521.76	616.82	671.78	726.74	529.20	579.54	629.84
70	350.30	391.32	432.32	305.60	341.02	376.40	521.76	573.92	626.10	480.76	525.48	570.20	667.10	724.90	782.62	575.82	630.78	685.72
71	380.12	423.00	465.86	331.68	368.96	406.22	566.46	622.38	678.28	525.48	573.92	622.38	724.90	787.30	849.72	618.66	676.42	734.18
72	411.82	457.46	503.14	365.24	406.22	447.22	605.62	664.32	722.98	562.74	613.08	663.38	778.90	844.14	909.32	661.52	723.96	786.36
73	443.50	491.94	540.40	391.32	434.20	477.04	650.36	712.76	775.18	611.18	665.26	719.26	832.94	902.84	972.70	704.36	769.60	834.80
74	475.18	526.42	577.66	421.12	465.86	510.58	696.92	762.16	827.34	650.36	707.16	764.00	886.98	959.68	999.98	747.24	817.12	886.98
75	512.46	567.42	622.38	450.94	499.38	547.84	743.52	813.40	883.26	693.20	752.80	812.44	948.50	999.98	999.98	795.68	869.28	942.88
76	575.82	634.50	693.20	514.30	566.46	618.66	829.22	904.68	980.14	778.90	844.14	909.32	999.98	999.98	999.98	883.26	963.40	999.98
77	641.00	704.36	767.74	579.54	636.36	693.20	913.08	993.22	999.98	864.62	935.42	999.98	999.98	999.98	999.98	974.56	999.98	999.98
78	704.36	771.46	838.54	644.72	706.24	767.74	999.98	999.98	999.98	955.94	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
79	775.18	847.86	920.52	713.70	779.86	846.00	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
41	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
42	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
43	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
44	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
45	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
46	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
47	70.82	81.98	93.18	50.32	58.72	67.08	108.08	122.98	137.90	85.70	98.78	111.80	167.72	186.34	204.98	141.62	156.52	171.44
48	72.68	84.78	96.90	52.16	61.52	70.82	109.96	125.78	141.62	89.44	102.50	115.52	169.60	189.14	208.72	147.22	163.04	178.90
49	76.42	88.50	100.64	55.92	65.24	74.54	113.68	129.52	145.34	91.34	105.30	119.26	173.32	192.86	212.44	147.22	163.04	178.90
50	78.26	91.34	104.36	59.64	70.82	81.98	119.26	136.06	152.80	95.06	109.04	122.98	178.90	199.38	219.88	152.80	169.60	186.34
51	78.26	91.34	104.36	59.64	70.82	81.98	119.26	136.06	152.80	95.06	109.04	122.98	178.90	199.38	219.88	152.80	169.60	186.34
52	81.98	95.06	108.08	67.08	78.26	89.44	122.98	139.78	156.52	96.90	111.80	126.70	182.62	203.14	223.60	152.80	169.60	186.34
53	83.86	97.86	111.80	68.96	81.06	93.18	126.70	145.34	163.96	104.36	119.26	134.18	184.50	205.94	227.34	160.24	178.90	197.52
54	83.86	97.86	111.80	68.96	81.06	93.18	130.46	149.08	167.72	104.36	119.26	134.18	188.22	209.66	231.06	160.24	178.90	197.52
55	89.44	104.36	119.26	74.54	87.58	100.64	136.06	155.60	175.16	109.96	125.78	141.62	193.78	216.16	238.50	169.60	189.14	208.72
56	93.18	108.08	122.98	78.26	91.34	104.36	149.08	169.60	190.06	119.26	136.06	152.80	206.86	230.14	253.42	178.90	199.38	219.88
57	98.78	114.60	130.46	83.86	97.86	111.80	158.40	179.84	201.24	130.46	149.08	167.72	216.16	240.40	264.60	188.22	209.66	231.06
58	108.08	124.86	141.62	89.44	104.36	119.26	167.72	190.06	212.44	143.50	163.04	182.62	232.94	259.96	286.98	197.52	219.88	242.26
59	119.26	137.90	156.52	95.06	110.88	126.70	180.76	204.06	227.34	152.80	173.32	193.78	245.98	273.92	301.86	216.16	240.40	264.60
60	124.86	144.42	163.96	108.08	124.86	141.62	193.78	219.88	245.98	167.72	190.06	212.44	260.88	290.70	320.52	227.34	253.42	279.52
61	130.46	150.94	171.44	111.80	128.60	145.34	203.14	230.14	257.16	180.76	204.06	227.34	270.20	300.94	331.68	236.66	263.68	290.70
62	139.78	161.20	182.62	119.26	137.90	156.52	216.16	244.14	272.04	190.06	214.32	238.50	285.12	317.74	350.30	255.30	284.20	313.04
63	149.08	171.44	193.78	124.86	144.42	163.96	225.48	254.38	283.24	201.24	227.34	253.42	300.02	334.48	368.96	264.60	294.42	324.24
64	154.68	177.96	201.24	130.46	150.94	171.44	234.78	264.60	294.42	214.32	241.34	268.32	309.32	344.74	380.12	277.68	308.40	339.14
65	163.96	188.22	212.44	139.78	161.20	182.62	255.30	287.92	320.52	229.20	258.10	286.98	327.96	365.24	402.50	294.42	327.96	361.50
66	191.94	218.96	245.98	162.12	185.42	208.72	288.84	323.32	357.78	259.02	289.78	320.52	368.96	409.94	450.94	329.84	366.18	402.50
67	219.88	249.70	279.52	190.06	216.16	242.26	324.24	361.50	398.78	296.30	330.76	365.24	411.82	455.62	499.38	370.84	410.90	450.94
68	244.14	276.76	309.32	216.16	244.14	272.04	365.24	406.22	447.22	329.84	366.18	402.50	460.26	507.80	555.30	409.94	452.82	495.66
69	272.04	307.46	342.86	234.78	264.60	294.42	400.66	444.44	488.20	363.38	403.46	443.50	505.00	556.24	607.46	456.54	504.08	551.58
70	300.02	338.22	376.40	264.60	298.14	331.68	441.64	489.16	536.64	398.78	441.64	484.48	549.72	604.68	659.66	495.66	546.00	596.28
71	327.96	368.96	409.94	290.70	326.12	361.50	477.04	527.36	577.66	432.32	477.04	521.76	592.56	650.36	708.10	532.92	587.00	641.00
72	352.22	396.00	439.76	309.32	346.58	383.86	514.30	568.34	622.38	465.86	514.30	562.74	639.16	701.60	764.00	573.92	631.70	689.48
73	378.28	423.92	469.58	337.28	377.36	417.40	553.44	610.26	667.10	499.38	549.72	600.02	682.00	747.24	812.44	614.94	676.42	737.92
74	408.10	457.46	506.86	363.38	405.30	447.22	592.56	652.20	711.82	536.64	590.72	644.72	730.46	799.42	868.34	654.08	718.34	782.62
75	439.76	491.94	544.12	391.32	436.04	480.76	633.56	696.92	760.26	572.06	628.90	685.72	775.18	847.86	920.52	700.64	769.60	838.54
76	501.28	558.10	614.94	449.10	498.46	547.84	700.64	769.60	838.54	639.16	701.60	764.00	844.14	923.32	999.98	769.60	845.06	920.52
77	559.02	620.54	682.00	510.58	564.62	618.66	769.60	843.22	916.80	708.10	775.18	842.26	913.08	998.78	999.98	836.70	917.76	998.78
78	622.38	687.62	752.80	573.92	631.70	689.48	842.26	922.40	999.98	780.78	854.40	927.98	985.76	999.98	999.98	909.32	996.94	999.98
79	685.72	756.54	827.34	637.28	700.64	764.00	913.08	998.78	999.98	851.60	930.78	999.98	999.98	999.98	999.98	978.30	999.98	999.98
80				700.64	767.74					924.26	999.98					999.98	999.98	
81				762.16	833.86					998.78	999.98					999.98	999.98	
82				829.22	906.56					999.98	999.98					999.98	999.98	
83				896.30	979.22					999.98	999.98					999.98	999.98	
84				957.80	999.98					999.98	999.98					999.98	999.98	

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD																		
Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
41	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
42	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
43	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
44	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
45	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
46	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
47	50.32	58.72	67.08	39.14	45.66	52.16	83.86	95.98	108.08	67.08	76.42	85.70	119.26	134.18	149.08	98.78	110.88	122.98
48	52.16	61.52	70.82	41.00	48.44	55.92	85.70	98.78	111.80	70.82	81.98	93.18	119.26	134.18	149.08	104.36	117.40	130.46
49	52.16	61.52	70.82	41.00	48.44	55.92	89.44	102.50	115.52	74.54	85.70	96.90	124.86	140.70	156.52	104.36	117.40	130.46
50	59.64	70.82	81.98	46.60	55.00	63.36	95.06	109.04	122.98	80.14	92.26	104.36	124.86	140.70	156.52	109.96	123.92	137.90
51	59.64	70.82	81.98	46.60	55.00	63.36	95.06	109.04	122.98	80.14	92.26	104.36	130.46	147.22	163.96	113.68	127.68	141.62
52	59.64	70.82	81.98	46.60	55.00	63.36	102.50	116.48	130.46	83.86	95.98	108.08	130.46	147.22	163.96	113.68	127.68	141.62
53	61.52	73.62	85.70	48.44	57.80	67.08	104.36	119.26	134.18	85.70	98.78	111.80	141.62	160.24	178.90	119.26	134.18	149.08
54	61.52	73.62	85.70	48.44	57.80	67.08	108.08	122.98	137.90	89.44	102.50	115.52	141.62	160.24	178.90	122.98	137.90	152.80
55	70.82	83.86	96.90	55.92	67.08	78.26	113.68	129.52	145.34	95.06	109.04	122.98	147.22	166.80	186.34	128.60	144.42	160.24
56	74.54	87.58	100.64	55.92	67.08	78.26	117.40	133.26	149.08	102.50	116.48	130.46	152.80	173.32	193.78	137.90	154.68	171.44
57	80.14	94.14	108.08	61.52	73.62	85.70	126.70	143.50	160.24	111.80	126.70	141.62	162.12	183.56	204.98	145.34	163.96	182.62
58	85.70	100.64	115.52	70.82	83.86	96.90	134.18	152.80	171.44	117.40	133.26	149.08	175.16	197.52	219.88	154.68	174.24	193.78
59	91.34	107.16	122.98	74.54	87.58	100.64	147.22	166.80	186.34	126.70	143.50	160.24	184.50	207.78	231.06	160.24	180.76	201.24
60	100.64	117.40	134.18	80.14	94.14	108.08	152.80	173.32	193.78	134.18	152.80	171.44	193.78	218.04	242.26	173.32	194.74	216.16
61	108.08	124.86	141.62	85.70	100.64	115.52	162.12	183.56	204.98	147.22	166.80	186.34	204.98	231.06	257.16	178.90	201.24	223.60
62	115.52	134.18	152.80	89.44	104.36	119.26	167.72	190.06	212.44	152.80	173.32	193.78	218.04	245.06	272.04	184.50	207.78	231.06
63	121.12	140.70	160.24	95.06	110.88	126.70	180.76	204.06	227.34	162.12	183.56	204.98	227.34	255.30	283.24	193.78	218.04	242.26
64	126.70	147.22	167.72	100.64	117.40	134.18	186.34	210.58	234.78	167.72	190.06	212.44	236.66	265.56	294.42	201.24	227.34	253.42
65	136.06	157.48	178.90	111.80	130.46	149.08	197.52	223.60	249.70	180.76	204.06	227.34	249.70	279.52	309.32	214.32	241.34	268.32
66	154.68	177.96	201.24	126.70	147.22	167.72	219.88	247.86	275.78	197.52	223.60	249.70	281.40	314.02	346.58	232.94	261.82	290.70
67	171.44	197.52	223.60	141.62	163.96	186.34	238.50	268.32	298.14	216.16	244.14	272.04	307.46	341.94	376.40	255.30	286.04	316.80
68	193.78	221.76	249.70	160.24	184.50	208.72	264.60	298.14	331.68	231.06	260.88	290.70	339.14	376.40	413.68	277.68	312.12	346.58
69	208.72	238.50	268.32	177.04	204.06	231.06	286.98	322.40	357.78	247.86	280.48	313.04	370.84	410.90	450.94	300.02	336.36	372.68
70	234.78	268.32	301.86	195.66	224.56	253.42	311.20	349.38	387.58	266.48	300.94	335.42	402.50	445.36	488.20	326.12	366.18	406.22
71	249.70	285.12	320.52	210.58	241.34	272.04	335.42	376.40	417.40	281.40	317.74	354.06	432.32	477.04	521.76	344.74	386.66	428.60
72	268.32	305.60	342.86	231.06	264.60	298.14	354.06	396.92	439.76	300.02	338.22	376.40	464.02	511.54	559.02	367.10	410.90	454.66
73	288.84	328.92	368.96	245.98	281.40	316.80	378.28	423.92	469.58	316.80	357.78	398.78	495.66	546.00	596.28	389.48	437.00	484.48
74	307.46	349.38	391.32	264.60	301.86	339.14	402.50	450.94	499.38	335.42	378.28	421.12	525.48	577.66	629.84	411.82	461.18	510.58
75	327.96	372.68	417.40	285.12	325.20	365.24	426.74	477.98	529.20	350.30	395.06	439.76	559.02	614.94	670.82	439.76	491.94	544.12
76	374.56	423.92	473.32	326.12	369.90	413.68	465.86	521.76	577.66	389.48	438.84	488.20	603.74	663.38	722.98	486.36	543.20	600.02
77	421.12	475.18	529.20	376.40	424.84	473.32	510.58	570.20	629.84	432.32	486.36	540.40	650.36	714.62	778.90	532.92	594.44	655.92
78	467.74	526.42	585.12	424.84	478.92	532.92	549.72	614.02	678.28	469.58	527.36	585.12	700.64	769.60	838.54	581.40	646.60	711.82
79	514.30	577.66	641.00	465.86	523.62	581.40	594.44	664.32	734.18	518.02	581.40	644.72	745.36	818.04	890.70	627.98	697.88	767.74
80				518.02	581.40					555.30	622.38					672.70	746.32	
81				562.74	629.84					598.16	669.90					722.98	801.28	
82				611.18	683.88					642.88	720.22					769.60	852.52	
83				663.38	741.64					687.62	770.54					818.04	904.68	
84				711.82	795.68					734.18	821.78					864.62	955.94	

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Supporting Document Schedules

Bypassed - Item:	Certification of Compliance
Bypass Reason:	See actuarial memo below.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	08/11/2017
Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	VA Revised Rate Revision Checklist_30160A_32100.20181212.pdf
Item Status:	Received & Acknowledged
Status Date:	06/22/2020
Satisfied - Item:	L&H Actuarial Memorandum
Comments:	
Attachment(s):	VA Revised Actuarial Memorandum_30160A_32100.20181212.pdf VA Actuarial Memorandum Exhibits_30160A_32100.20181212.xlsx
Item Status:	Received & Acknowledged
Status Date:	06/22/2020
Satisfied - Item:	Long Term Care Insurance Rate Request Summary
Comments:	
Attachment(s):	VA Revised Long Term Care Insurance Rate Request Summary_30160A_32100.20181212.pdf
Item Status:	Received & Acknowledged
Status Date:	06/22/2020
Satisfied - Item:	Policyholder Notification Letter Samples
Comments:	
Attachment(s):	115743 - John Doe (SP NonWP)_30160A_32100.20191125.pdf 115744 - John Doe (SP WP)_30160A_32100.20191125.pdf 115746 - John Doe (Change Form)_30160A_32100.20191125.pdf
Item Status:	Received & Acknowledged
Status Date:	06/22/2020
Satisfied - Item:	Misc Related Documents
Comments:	

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Attachment(s):	112459 VA LTC Endorsement.pdf 291524 VA LTC Coverage Change Request Form.pdf LTC Rate Increase Policyholder Q&A.pdf
Item Status:	Received & Acknowledged
Status Date:	08/11/2017

Satisfied - Item:	Cover Letter and Third Party Document
Comments:	
Attachment(s):	Milliman_Involvement_VA_30160A_32100_20170802.pdf VA CovLtr_30160A_32100_20170802.pdf
Item Status:	Received & Acknowledged
Status Date:	08/11/2017

Satisfied - Item:	Response letter and attachments
Comments:	
Attachment(s):	VA Response_30160A_32100.20180712.pdf VA Response Attachments_30160A_32100.20180712.xlsx
Item Status:	Received & Acknowledged
Status Date:	06/22/2020

Satisfied - Item:	Statements of Variability
Comments:	
Attachment(s):	SOV 291524-VA.pdf SOV VA LTC Endorsement 112459.pdf SOV VA LTC PlcyholderLtrs 112016 112018.pdf
Item Status:	Received & Acknowledged
Status Date:	06/22/2020

Satisfied - Item:	Response 12-12-18 and Response Attachments
Comments:	
Attachment(s):	VA Response_30160A_32100.20181212.pdf VA Response Attachments_30160A_32100.20181212.xlsx
Item Status:	Received & Acknowledged
Status Date:	06/22/2020

Satisfied - Item:	30165A Approval
Comments:	
Attachment(s):	VA 30165A 10-2-97 Apprvl.pdf
Item Status:	Received & Acknowledged

State:	Virginia	Filing Company:	RiverSource Life Insurance Company
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified		
Product Name:	Long Term Care		
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017		

Status Date:	06/22/2020
Satisfied - Item:	VA Percentage of Premium of Rider Form 30165A
Comments:	As this was previously approved and there are no changes to the percentage of premium on the schedule, we have moved this rider rate schedule as instructed from the Rate/Rule tab and placed it under Supporting Documentation.
Attachment(s):	VA Percentage of Premium Rider Form 30165A.20170802.pdf
Item Status:	Received & Acknowledged
Status Date:	06/22/2020
Satisfied - Item:	Response 5/6/2019
Comments:	
Attachment(s):	VA Response_30160A_32100.20190506.pdf
Item Status:	Received & Acknowledged
Status Date:	06/22/2020

SERFF Tracking #:	AERS-131005512	State Tracking #:	AERS-131005512	Company Tracking #:	30160A-VA, 32100 2017
State:	Virginia	Filing Company:	RiverSource Life Insurance Company		
TOI/Sub-TOI:	LTC03I Individual Long Term Care/LTC03I.001 Qualified				
Product Name:	Long Term Care				
Project Name/Number:	30160A-VA, 32100 2017/30160A-VA, 32100 2017				

Attachment VA Actuarial Memorandum Exhibits_30160A_32100.20181212.xlsx is not a PDF document and cannot be reproduced here.

Attachment VA Response Attachments_30160A_32100.20180712.xlsx is not a PDF document and cannot be reproduced here.

Attachment VA Response Attachments_30160A_32100.20181212.xlsx is not a PDF document and cannot be reproduced here.

Rate Review Requirements Checklist

For all Rate Filings for Forms Issued in the Individual and Small Group Markets, Hospital Confinement Indemnity, Disability Income Protection, Accident Only, Specified Disease and Other, whether paid on an expense incurred or indemnity basis, and Medicare Supplement

NOTE: This document is intended to assist carriers in preparing rate filings for individual and selected group accident and sickness insurance coverage for approval by the Bureau of Insurance. It provides guidance based on current Virginia laws and regulations. It should be noted, however, that this checklist should not be used exclusive of other important resources, including, but not limited to, any and all other applicable state insurance laws and associated rules and regulations. It is the responsibility of the carriers to verify that their products comply with all relevant statutory and regulatory requirements. Note that some regulatory references in the comments column are approximate. Please review the applicable Administrative Code for the full text of the regulation.

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
General Filing Requirements				
Information about the filing	14 VAC 5-100-70	When submitting an Individual Accident and Sickness form, a company must file the applicable rates, rules and classification of risks with the Commission.	Cover Letter	
Company Name and NAIC No.	Administrative Letter 1983-7	The transmittal letter must include the name and NAIC number of the company for which the filing is made.	Cover Letter	
Additional SERFF Filing Requirements	Administrative Letter 2012-03	Additional SERFF filing requirements must be met as specified below for health insurance rate filings. Failure to provide the applicable information will result in a "REJECTED" filing.		
General Information Filing Description		All submissions must provide a brief summary of the filing, including a statement describing whether the rate or rate manual is new or a revision of an existing rate or rate manual.	Cover Letter	
		Identification of SERFF or state tracking number for the previously approved rate or rate manual.	Cover Letter	
HELP TIP:		If a form or rate filing is submitted as new in Virginia, but was previously disapproved or withdrawn in Virginia, please provide details such as the tracking information, form number, and the date that the form or rate filing was disapproved or withdrawn, if available.		
Rate Changes		(i) Include a statement regarding an increase, decrease, revision of former rates. (ii) Specify the percentage amount(s) of the change(s). (iii) Specify the number of affected policyholders. (iv) Specify the reason for the proposed change(s).	Act Mem, Section 16 Act Mem, Section 16 Act Mem, Section 20 Act Mem, Section 16	

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-50 B	Include an actuarial memorandum describing the basis on which rates were determined including a description of the calculation of the anticipated loss ratio.		
Individual and Small Group Markets – Age Curve	14 VAC 5-130- 50 E 1; Virginia Rate Template	Premium rates with respect to a particular plan or coverage may only vary by: (a) Whether the plan or coverage covers an individual or family; (b) The rating area; (c) Age, consistent with the Federal Default Standard Age Curve; (d) Tobacco use, except the rate must not vary more than 1.5 to 1. If included in a small group form, employees must be given the option to avoid the tobacco surcharge by participating in certain wellness programs.		
	14 VAC 5-130-50 E 2	A premium rate must not vary by any other factor not described in 14 VAC 5-130-50 E 1.		
	14 VAC 5-130-50 E 3	For family coverage, permitted rating variations must be applied based on the portion of premium attributable to each family member covered under the plan. With respect to family members under age 21, the premiums for no more than the three oldest covered children must be taken into account in determining the total family premium.		
	14 VAC 5-130-50 E 4	The premium charged must not be adjusted more frequently than annually except that the premium rate may be changed to reflect changes to: (i) Family composition of the member or; (ii) Coverage requested by the member.		
	14 VAC 5-130-50 E 5	Premium rates for student health insurance coverage may be based on school-specific community rating and are exempt from subdivision 1 through 4 above.		
Accident and Sickness Insurance Rate Filing Requirements – Filing a Rate for a New Policy Form	14 VAC 5-130-60 A	New rate submission must include: (i) Form number of applicable policy or certificate, application, and endorsements; (ii) Rate Sheet(s); (iii) Unified Rate Review Template (<i>only for rates applicable in the individual and small group health insurance markets except for student health insurance coverage</i>).		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-60 B	An Actuarial Memorandum that includes:		
	14 VAC 5-130-60 B 1	A description of the type of policy or coverage, including benefits, renewability, general marketing method, and issue age limits.		
	14 VAC 5-130-60 B 2	A description of how rates were determined, including the general description and source of each assumption used.		
	14 VAC 5-130-60 B 3	The estimated average annual premium per policy and per member.		
	14 VAC 5-130-60 B 4	The anticipated loss ratio and a description of how it was calculated.		
	14 VAC 5-130-60 B 5	The minimum anticipated loss ratio presumed reasonable in accordance with 14 VAC 5-130-65.		
	14 VAC 5-130-60 B 6	If the anticipated loss ratio is less than the minimum anticipated loss ratio, include supporting documentation for the use of such premiums.		
	14 VAC 5-130-60 B 7	<i>For coverage issued in the Individual or Small Group Health Insurance Market:</i> A certification by a qualified actuary of the actuarial value of each plan of benefits included and the AV calculation summary.		
	14 VAC 5-130-60 B 8	A certification by a qualified actuary that, to the best of his or her knowledge and judgment, the rate filing is in compliance with the applicable laws and regulations of Virginia and the premiums are reasonable in relation to the benefits provided.		
Reasonableness of benefits in relation to initial premiums	14 VAC 5-130-65 A	Benefits are deemed reasonable in relation to premiums if the anticipated loss ratio of policy form, including riders and endorsements, is at least as great as specified in the table provided, taking into account the qualifications and adjustments in subdivisions 1 through 9 below. The below anticipated loss ratio standards do not apply to a class of business where such standards are in conflict with specific statutes or regulations.		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS					LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-65 A 1	If the expected average annual premium is at least \$200 but less than \$1,000.						
		Type of Coverage	<u>Renewal Clause</u>					
			<u>OR</u>	<u>CR</u>	<u>GR</u>	<u>NC</u>	<u>Other</u>	
		<u>Hospital Indemnity</u>	<u>60%</u>	<u>55%</u>	<u>55%</u>	<u>50%</u>	<u>60%</u>	
		<u>Disability Income Protection, Accident Only, Specified Disease and Other, whether paid on an expense incurred or indemnity basis</u>	<u>60%</u>	<u>55%</u>	<u>50%</u>	<u>45%</u>	<u>60%</u>	
	14 VAC 5-130-65 A 2	If the expected average annual premium is \$100 or more but less than \$200, subtract five percentage points from the numbers in the table.						
	14 VAC 5-130-65 A 3	If the expected average annual premium is less than \$100, subtract 10 percentage points from the numbers in the table.						
	14 VAC 5-130-65 A 4	If the expected average annual premium is \$1,000 or more, add five percentage points to the numbers in the table.						
	14 VAC 5-130-65 A 5	Group Medicare supplement policies are expected to return to policyholders in the form of aggregate benefits under the policy at least 75% of the aggregate amount of premiums collected.						

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
	14 VAC 5-130-65 A 6	Medicare supplement policies issued prior to July 30, 1992, as a result of solicitation of individuals through the mail or by mass media advertising, which shall include both print and broadcast advertising, are expected to return to policyholders in the form of aggregate benefits under the policy at least 60% of the aggregate amount of premiums collected.		
	14 VAC 5-130-65 A 7	Medicare supplement policies issued prior to July 30, 1992, sold on an individual rather than a group basis are expected to return to policyholders in the form of aggregate benefits under the policy at least 60% of the aggregate amount of premiums collected.		
	14 VAC 5-130-65 A 8	All health insurance coverage issued in the individual health insurance market shall be originally priced to meet a minimum 75% loss ratio and, except for student health insurance coverage, must be guaranteed renewable or noncancellable.		
	14 VAC 5-130-65 A 9	All health insurance coverage issued in the small group health insurance market must be originally priced to meet a minimum 75% loss ratio and must be guaranteed renewable or noncancellable.		
	14 VAC 5-130-65 B	The average annual premium per policy per member shall be computed by the health insurance issuer based on an anticipated distribution of business by all applicable criteria having a price difference, such as age, sex, amount, dependent status, rider frequency, etc., except assuming an annual mode for all policies (<i>i.e., the fractional premium loading shall not affect the average annual premium or anticipated loss ratio calculation</i>).		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
All Accident and Sickness Forms; Subscriber Contracts of Hospital, Medical or Surgical Plans; Dental Plans; Optometric Plans; Health Insurance Coverage in the Individual and Small Group Markets; Individual and Group Medicare supplement forms and subscriber contracts of hospital, medical or surgical plans – Filing a Rate Revision	14 VAC 5-130-70 A	Rate revision submission must include: (i) New Rate Sheet; (ii) All information required by SERFF; and (iii) Unified Rate Review Template (individual and small group health insurance markets except for student health insurance coverage).	Act Mem, Exhibit 17 SERFF	
	14 VAC 5-130-70 B	Actuarial Memorandum		
	14 VAC 5-130-70 B 1	A description of the type of policy, including benefits, renewability, issue age limits, and if applicable, whether the policy includes grandfathered, non-grandfathered plans, or both.	Act Mem, Section 2	
	14 VAC 5-130-70 B 2	The scope and reason for the premium or rate revision.	Act Mem, Section 16	
	14 VAC 5-130-70 B 3	A comparison of the revised premiums with the current premium scale, including all percentage rate changes and any rating factor changes.	Act Mem, Exhibit 16	
	14 VAC 5-130-70 B 4	A statement of whether the revision applies only to new business, only to in-force business, or to both.	Act Mem, Section 4	
	14 VAC 5-130-70 B 5	The estimated average annual premium per policy and per member, before and after the proposed rate revision. If different changes by rating classification are requested, the filing also must include: (i) Range of changes; and (ii) average overall change, including a detailed explanation of how the change was determined.	Act Mem, Section 17	
	14 VAC 5-130-70 B 6	<i>The following is applicable to all coverage with the exception of coverage issued in the small group market:</i> Submit Form 130-A showing historical and projected experience, including: (i) Projections for future experience, and Virginia and national historical experience of earned premiums, paid claims, incurred claims and loss from inception through	Act Mem, Exhibits 9-12 Actual and projected experience are based on historical experience through June 30, 2018, which is the most recent data available.	

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
		<p>most recent quarter. Virginia and national experience should be shown separately. Missing experience should be estimated with all estimation assumptions and methodologies provided in detail;</p> <p>(ii) A statement of the basis for determining the rate revision (Virginia, national, or blended); and</p> <p>(iii) If blended, provide the credibility factor assigned to the national experience.</p>	<p>Act Mem, Section 14</p> <p>N/A</p>	
	14 VAC 5-130-70 B 7	Details and dates of all past rate revisions, including annual rate revisions members will experience resulting from this filing. If a company only revises rates annually, the rate revision must be identical to the current submission. If a company has had more frequent rate revisions, the annual revision must reflect the compounding impact of all revisions for the past 12 months.	Act Mem, Section 15	
	14 VAC 5-130-70 B 8	A description of how revised rates were determined, including the general description and source of each assumption of Form 130-A. For claims, provide historical and projected claims by major service category for both cost and utilization on Form 130-B.	Act Mem, Sections 5, 14, 16	
	14 VAC 5-130-70 B 9	If the rate revision applies to new business, provide the anticipated loss ratio and a description of how it was calculated.	N/A	
	14 VAC 5-130-70 B 10	<p>If the rate revision applies to in-force business provide:</p> <p>(a) The anticipated loss ratio and a description of how it was calculated; and</p> <p>(b) The estimated cumulative loss ratio, historical and anticipated, and a description of how it was calculated.</p>	<p>Act Mem, Section 14 and Exhibits 9,10</p> <p>Act Mem, Exhibits 9,10</p>	
	14 VAC 5-130-70 B 11	The loss ratio that was originally anticipated for the policy.	Act Mem, Exhibit 15	
	14 VAC 5-130-70 B 12	If 9, 10a, or 10b is less than 11, supporting documentation for the use of such premiums or rates.	N/A	
	14 VAC 5-130-70 B 13	The current number of Virginia and national members to which the revision applies for the most recent month for which such data is available, and either premiums in force, premiums earned, or premiums collected for such members in the year immediately prior to the filing of the rate revision.	Act Mem, Section 20	
	14 VAC 5-130-70 B 14	Certification by a qualified actuary that, to the best of the actuary's knowledge and judgment, the rate filing is in compliance with applicable laws and regulations of this Commonwealth and the premiums are reasonable in relation to the benefits provided.	Act Mem, Section 21	
	14 VAC 5-130-70 B 15	For coverage issued in the individual or small group health insurance markets, a certification by a qualified actuary of the		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
		actuarial value of each plan of benefits included and the AV calculation summary.		
Health Insurance Issuer – Filing a Rate Revision	14 VAC 5-130-75 A 1	For individual accident and sickness insurance, individual, and group Medicare supplement insurance, and coverage issued in the individual market, with respect to filings of rate revisions for a previously approved form, benefits shall be deemed reasonable in relation to premiums provided the present values of the future and lifetime loss ratios are at least as great as the standards in 14 VAC 5-130-70 B 11.		
Health Insurance Issuer – Filing a Rate Revision	14 VAC 5-130-75 B	For coverage issued in the small group health insurance market, the anticipated loss ratio over the entire period for which the revised rates are computed to provide coverage must be at least as great as the standards in 14 VAC 5-130-70 B 11.		
Health Insurance Issuer – Filing a Rate Revision	14 VAC 5-130-75 C	Revised premiums for policies issued on or after the effective date of the revision must meet the standards in 14 VAC 5-130-65 A, except the average annual premium shall be determined on actual rather than anticipated distribution of business.		
Medicare Supplement Requirements		<i>Applicable requirements for Medicare Supplement insurance rate filings in addition to the above:</i>		
Standardized Medicare Supplement Forms	14 VAC 5-170-120 A 2	All filings of rates and rating schedules shall demonstrate that expected claims in relation to premiums comply with the requirements of this section when combined with actual experience to date. Filings of rate revisions shall also demonstrate that the anticipated loss ratio over the entire future period for which the revised rates are computed to provide coverage can be expected to meet the appropriate loss ratio standards.		
Pre-Standardized Medicare Supplement Forms	14 VAC 5-170-120 A 3	For policies issued prior to July 30, 1992, expected claims in relation to premiums shall meet: (a) The originally filed anticipated loss ratio when combined with the actual experience since inception; (b) The appropriate loss ratio requirement from subdivisions 1 a and 1 b of this subsection when combined with actual experience beginning with July 1, 1991, to date; and (c) The appropriate loss ratio requirement from subdivisions 1 a and 1 b of this subsection over the entire future period for which the rates are computed to provide coverage.		
Annual Rate and Experience Filing	14 VAC 5-170-120 C	An issuer of Medicare supplement policies and certificates issued before or after July 30, 1992, in this Commonwealth shall file annually its rates, rating schedule, and supporting		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
		documentation including ratios of incurred losses to earned premiums by policy duration for approval by the State Corporation Commission in accordance with the filing requirements and procedures prescribed by the State Corporation Commission. The supporting documentation shall also demonstrate in accordance with actuarial standards of practice using reasonable assumptions that the appropriate loss ratio standards can be expected to be met over the entire period for which rates are computed. The demonstration shall exclude active life reserves. An expected third-year loss ratio which is greater than or equal to the applicable percentage shall be demonstrated for policies or certificates in force less than three years.		
Actuarial Certification for Medicare Supplement Rate Revision Filings	14 VAC 5-170-120 C	<p>For annual rate and experience filings, an actuarial certificate by a qualified actuary that the best of the actuary's knowledge and judgment, the following items are true with respect to the filing as follows:</p> <ol style="list-style-type: none"> 1. The assumptions present the actuary's best judgment as to the reasonable value for each assumption and are consistent with the issuer's business plan at the time of the filing; 2. The anticipated lifetime loss ratio, future loss ratios, and except for policies issued prior to July 30, 1992, third-year loss ratios all exceed the applicable ratio; 3. Except for policies issued prior to July 30, 1992, the filed rates maintain the proper relationship between policies which had different rating methodologies; 4. The filing was prepared based on the current standards of practices as promulgated by the Actuarial Standards Board, including the data quality standard of practice, as described at: www.actuary.org; 5. The filing is in compliance with the applicable laws and regulations in this Commonwealth; and 6. The premiums are reasonable in relation to the benefits provided. 		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
Actuarial Certification for Medicare Supplement Rate Revision Filings	14 VAC 5-170-130 B	<p>For proposed rate changes, an actuarial certificate by a qualified actuary that to the best of the actuary's knowledge and judgment, the following items are true with respect to the filing as follows:</p> <ol style="list-style-type: none"> 1. The assumptions present the actuary's best judgment as to the reasonable value for each assumption and are consistent with the issuer's business plan at the time of the filing; 2. The anticipated lifetime loss ratio, future loss ratios, and except for policies issued prior to July 30, 1992, third-year loss ratio all exceed the applicable ratio; 3. The filing was prepared based on the current standards or practices as promulgated by the Actuary Standards Board including the data quality standard of practice as described at: www.actuary.org; 4. The filing is in compliance with applicable laws and regulations in this Commonwealth; and 5. The premiums are reasonable in relation to the benefits provided. 		
Change in the Rating Structure or Methodology of a Medicare Supplement Form	14 VAC 5-170-130 D 3	<p>A change in the rating structure or methodology shall be considered a discontinuance under subdivision 1 of this subsection unless the issuer complies with the following requirements:</p> <ol style="list-style-type: none"> (a) The issuer provides an actuarial memorandum, in a form and manner prescribed by the State Corporation Commission, describing the manner in which the revised rating methodology and resultant rates differ from the existing rating methodology and existing rates. (b) The issuer does not subsequently put into effect a change of rates or rating factors that would cause the percentage differential between the discontinued and subsequent rates as described in the actuarial memorandum to change. 		

REVIEW REQUIREMENTS	REFERENCE	COMMENTS	LOCATION IN THE FILING TO INCLUDE EXHIBIT NAME OR NUMBER	FILER'S NOTES
For Coverage in the Individual and Small Group Health Insurance Markets Risk Pools and Index Rates	14 VAC 5-130-81 A & B	The claims experience of all enrollees in all health benefit plans are members of a single risk pool. <i>(Not applicable to grandfathered coverage).</i>		
	14 VAC 5-130-81 C	Each plan year or policy year, as applicable, a health insurance issuer shall: <ol style="list-style-type: none"> 1. Establish an index rate based on the total combined claim costs for providing essential health benefits within the single risk pool of the individual or small group market; 2. The index rate may be adjusted on a market-wide basis based on the total expected market-wide payments and charges under the risk adjustment and reinsurance programs in this Commonwealth and the health benefit exchange user fees, and 3. The premium rate for all of the health insurance issuer's plans shall use the applicable index rate, as adjusted in accordance with subsection D of this section. 		
	14 VAC 5-130-81 D	<ol style="list-style-type: none"> 1. The actuarial value and cost-sharing design on the plan. 2. The plan's provider network, delivery system characteristics, and utilization management practices. 3. The benefits provided under the plan that are in addition to the essential health benefits. These additional benefits shall be pooled with similar benefits within a single risk pool and the claims experience from those benefits shall be utilized to determine rate variations for plans that offer those benefits in addition to essential health benefits. 4. Administrative costs, excluding health benefit exchange user fees. 5. With respect to catastrophic plans, the expected impact of the specific eligibility categories for those plans. 		

Access to Administrative Letters, Administrative Orders, Regulations and Laws is available at:

<http://www.scc.virginia.gov/boi/laws.aspx>

The Life and Health Division, Rates Section reviews rate revisions. Please contact this section at (804) 371-9110 if you have questions or need additional information about this line of insurance.

I hereby certify that I have reviewed the attached rate revision filing and determined that it is in compliance with the rate revision checklist.

Signed: Anju Gupta-Lavey Digitally signed by Anju Gupta-Lavey
Date: 2018.12.12 18:23:45 -06'00'

Name (please print): Anju Gupta-Lavey

Company Name: RiverSource Life Insurance Company

Date: December 12, 2018

Phone No: 612-671-2909 FAX No: 612-671-1748

E-Mail Address anju.x.gupta-lavey@ampf.com

Clear Form

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for Policy Form 30160A, Subject to Endorsement Form 32100

December 2018

Policy form 30160A-VA, subject to endorsement form 32100, is an individual policy form providing benefits to individuals for confinement in a nursing home with home care services. This policy form was issued with endorsement in Virginia from July 15, 2000 to June 15, 2003. This rate filing applies to policies issued with the endorsement only.

1. Purpose of Filing

This Actuarial Memorandum has been prepared for the purpose of demonstrating the compliance of this premium rate increase filing with the applicable laws of the State of Virginia and with the rules of the Bureau and that the requested premium rate increase meets the dual-loss ratio standard for individual long-term care policy forms set forth in the NAIC Model Bulletin for Alternative Filing Requirements for Long-Term Care Premium Rate Increases ("the Bulletin"), as adopted by the NAIC on December 18, 2013. It may not be appropriate for other purposes.

2. Description of Benefits

This is a federally tax qualified, individually underwritten policy form that provides comprehensive long-term care coverage. Benefits are payable for nursing home and assisted living facility ("ALF") care, home and community care, adult day care, respite care, caregiver training and case management services. Equipment purchase benefits are also included with a lifetime maximum of 50 times the home and community care daily maximum benefit ("HCCDMB") amount. Benefits may be payable for other supplies and services if they are specified in an alternate plan of care agreed to by the insured, the insured's physician and RiverSource Life Insurance Company ("RiverSource Life").

This policy reimburses expenses incurred by the insured subject to the amount of coverage purchased. The facility care daily maximum benefit ("FCDMB") amount was elected by the insured at the time of issue. The FCDMB amount is applied to nursing home, ALF, bed reservation, respite care and alternative plan of care benefits. The HCCDMB amount was also elected by the insured at the time of issue and is a percentage (50%, 75% or 100%) of the FCDMB amount. The HCCDMB amount is applied to home care and adult day care.

The lifetime maximum benefit amount was also elected at the time of issue. This established the maximum amount that will be paid under the policy for the combined total of all benefit payments. The choices were: 730 x FCDMB, 1,460 x FCDMB, 2,190 x FCDMB and unlimited (also referred to as "lifetime").

INFLATION PROTECTION

At the time of issue, the insured had the choice to elect No Benefit Increase Option, the Simple Benefit Increase Option or the Compound Benefit Increase Option. The Simple Benefit Increase Option increases the daily maximum benefit amounts (both facility and home and community care amounts) by 5% of the original daily maximum benefit amount each year starting with the second policy year and continuing for the life of the policy. The Compound Benefit Increase Option increases the previous year's daily maximum benefit amounts (both the facility and home and community care amounts) by 5% each year starting with the second policy year and continuing for the life of the policy. The

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increasing benefit option will apply even when the policy is in claim status. The remaining lifetime maximum benefit amount, before the increase, also increases each policy year by the same percentage that the FCDMB amount increases. When the total amount paid under a policy is equal to the current lifetime maximum benefit amount, the policy is terminated.

DEDUCTIBLE PERIOD

Benefit payments commence after a deductible period of 20 or 90 days of service, depending on the plan initially chosen. Satisfaction of the deductible period begins with the first day on which benefit eligibility is established and expenses are incurred for which payment would be made if there were no deductible period. Only days in which services are used are credited toward satisfaction of the deductible period. These days do not need to be consecutive, but they must occur within a continuous period of three times the number of days in the deductible period. Only one deductible period needs to be satisfied during the lifetime of the policy.

The deductible period applies to all policy benefits except caregiver training, case management, equipment purchase and respite care. Days for which the only expenses incurred are expenses that are not subject to the deductible period will not be used to satisfy the deductible period.

BENEFIT ELIGIBILITY AND CONDITIONS

Benefit eligibility is based on the following: (a) the insured being unable to perform at least 2 or more of the following 6 activities of daily living ("ADLs"): (1) eating, (2) toileting, (3) transferring, (4) dressing, (5) continence and (6) bathing, without substantial assistance for a period of at least 90 days due to a loss of functional capacity; or (b) severe cognitive impairment requiring substantial supervision; or (c) the insured having a level of disability similar to that described in (a) above, based on standards established by the Secretary of the Treasury. A licensed health care practitioner must certify the eligibility conditions at least annually.

A Medicare non-duplication provision excludes benefits that otherwise would be paid but for the application of a Medicare deductible or coinsurance amount.

FACILITY CARE BENEFITS

Facility care benefits are payable for nursing home confinement, whether skilled, intermediate or custodial levels of care are received. Hospital confinement is not a prerequisite for benefit entitlement. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in a nursing home will be reimbursed up to the FCDMB amount that applies on the day expenses are incurred.

Facility care benefits are also payable for stays in a qualified ALF. A qualified ALF is one that has a minimum of 8 inpatients and has a 24-hour awake, trained and ready to respond staff. Once benefit eligibility is established and the deductible period is satisfied, expenses incurred as a resident inpatient in an ALF will be reimbursed up to the FCDMB amount that applies on the day expenses are incurred.

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Premium payments will be waived during extended nursing home and ALF stays. The premium waiver begins after 90 days of confinement (including during the deductible period) in a nursing home or ALF. These days do not need to be consecutive, but they must occur within a continuous period of 180 days. The premium waiver stops once nursing home and ALF benefits cease.

If a temporary hospitalization is required during a period of confinement in a nursing home or ALF and there is a charge to reserve a bed in the facility, this policy will pay the FCDMB amount for up to 21 days per policy year. These days also count towards satisfying the deductible period.

HOME CARE BENEFITS

Home care benefits covered at 100% of the HCCDMB amount are services provided by a nurse, a licensed physical, occupational or speech therapist, a home health aide, a personal care attendant and adult day care. Home care benefits covered at 80% of the HCCDMB amount are homemaker and chore services. These expenses will be reimbursed subject to the percent of the HCCDMB amount listed above on the day expenses are incurred.

Premium payments will be reimbursed on a month-to-month basis during extended periods of home and community care. The premium waiver begins after expenses for home and community care services, excluding homemaker and chore services, have been incurred for 90 days. The expenses may be incurred while the deductible period is being satisfied or policy benefits are being received. These days do not need to be consecutive, but they must occur within a continuous period of 270 days. The premiums will continue to be reimbursed for each month in which at least 12 days of home and community care services, excluding homemaker and chore services, are received.

ADDITIONAL BENEFITS

Benefits in this section do not count against either the FCDMB or HCCDMB amounts. They are, however, deducted from the lifetime maximum benefit amount, except for certain case management services described below. These expenses are not subject to the deductible period and they may not be used to satisfy the deductible period.

Expenses incurred for the first 14 days of respite care received during a policy year will be reimbursed subject to the FCDMB amount that applies on the day expenses are incurred.

Pre-approved equipment purchase expenses will be reimbursed up to a lifetime maximum of 50 times the HCCDMB amount. This equipment must be expected to help the insured remain in their home for at least 90 days.

Caregiver training expenses will be reimbursed up to a lifetime maximum of 5 times the HCCDMB amount.

The initial assessment fee for case management services is reimbursable, but, to the extent it exceeds 5 times the FCDMB amount, it will be deducted from the lifetime maximum benefit amount. Other fees charged for case management services are

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reimbursable, but, to the extent they exceed 2 times the FCDMB amount per use, they are deducted from the lifetime maximum benefit amount.

NONFORFEITURE BENEFIT RIDER

The insured had the option to select a nonforfeiture benefit rider at the time of issue. The nonforfeiture benefit rider provides a reduced lifetime maximum benefit amount upon lapse. The FCDMB and HCCDMB amounts will continue at the same level as of the date of lapse, regardless of whether a benefit increase option was selected by the insured at issue.

The nonforfeiture benefit will begin if the policy terminates due to nonpayment of premium after the policy and rider have been in force for at least 3 years. The reduced lifetime maximum benefit amount is determined as the sum of all premiums paid at the time of lapse, including the premiums for the nonforfeiture benefit rider. The reduced lifetime maximum benefit amount will not be less than 30 times the FCDMB amount at the time of lapse. In no case will the sum of the benefits paid during the premium paying period and the reduced lifetime maximum benefit amount exceed the lifetime maximum benefit amount at time of lapse.

The provisions for the benefit are at least as favorable as those prescribed by the 1996 NAIC Model Regulation.

3. Renewability

This policy form issued with endorsement is guaranteed renewable for life.

4. Applicability

This rate filing is applicable to in force policies issued with endorsement form 32100 only, as this policy form issued with endorsement is no longer being sold in the market.

5. Actuarial Assumptions

Exhibit 1 provides a comparison of the original pricing assumptions and the current assumptions used in this rate filing for morbidity, mortality, lapses and interest.

Exhibits 2 through 5 provide experience analysis summaries for morbidity, mortality, lapse and policyholder behavior related to premium rate increases in support of the current premium rate increase assumptions.

The following discussion describes the actuarial assumptions used in the current premium rate increase analysis and summarizes our experience analysis in support of these assumptions as well as the company's management of this block of business. We believe the current assumptions are justified by the underlying experience and that the changed assumptions from original pricing are reasonable.

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Morbidity

RiverSource Life began marketing nursing home policies with a zero-day prior hospitalization requirement in 1989. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits for policies with No Benefit Increase Option. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

RiverSource Life began marketing home health care benefit riders in 1990. Only limited insured experience was available for home and community care benefits at the time of original pricing. Therefore, the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home care claims incidence.

Claim costs for the Simple and Compound Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long-term care ("LTC") experience under the applicable underwriting criteria.

Currently assumed expected claim costs are the product of original pricing expected claim costs and actual-to-expected morbidity adjustment factors ("morbidity A/E factors"). The company took steps beginning in 2003 to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible, which is reflected in a 5% reduction in expected claim costs for 2004 and later.

We conduct a morbidity study every year to analyze the current morbidity A/E factors. The analysis is done on a claim cost basis, rather than on a frequency and severity basis, which is not readily available. The current study includes actual emerging

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experience through anniversaries ending December 2017 and is based on 3,652 actual claims (1,156 with a lifetime benefit period and 2,496 with non-lifetime benefit periods).

The morbidity study compares actual incurred claims to expected incurred claims, where expected claims reflect the original pricing claim costs adjusted with the company's most recent set of morbidity A/E factors. If the resulting cumulative actual-to-expected ratio is near 100% while minimizing the squared error, no changes are made to the morbidity A/E factors. However, if the actual-to-expected ratio has shifted away from 100% or the squared error is too high, we develop a new set of morbidity A/E factors and retest them until a good fit is found (measured by actual-to-expected ratio and squared error).

The currently assumed morbidity A/E factors are provided in Exhibit 1.

Professional judgment is applied to create morbidity A/E factors for periods beyond that for which there is actual experience. It has been credibly observed on older forms, including 30160A issued with endorsement, that experience has been favorable at younger attained ages but much worse than priced for at older attained ages. Thus, we believe morbidity A/E factors that increase by duration are appropriate.

Exhibit 2 provides a comparison of actual and expected experience, where expected experience reflects claim costs using current morbidity A/E factors. As shown in this exhibit, the ratio of total actual-to-expected claims using the current morbidity A/E factors is 100.0%. Claim counts split by issue age band are also provided in Exhibit 2.

Mortality

We conduct a mortality study every year to develop durational mortality actual-to-expected adjustment factors ("mortality A/E factors") that are applied to the 1983 Individual Annuity Mortality ("IAM") Basic table. The mortality study is based on actual experience for all LTC policies combined. The current study includes 57,082 deaths incurred on policies from policy anniversaries in 2000 through policy anniversaries in 2017.

The current mortality A/E factors were developed subject to the constraint that the factors must be non-decreasing by duration. The mortality A/E factors are assumed to differ by issue age band, since the selection period is expected to be shorter at older issue ages.

At the older issue ages, the current mortality A/E factors increase to 100% of the table or higher. In general, that has not been the case through duration 26 for younger issue ages, but we expect that it will as insureds reach a very advanced age. For this reason, the mortality A/E factors extend to duration 35 for younger issue ages.

The currently assumed mortality A/E factors are provided in Exhibit 1.

Exhibit 3 provides a comparison of actual and expected deaths, where the expected basis reflects the 1983 IAM Basic table with the currently assumed mortality A/E factors. The mortality A/E factors fit the observed data very well with the resulting ratio of actual-to-expected deaths at or near 100%.

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Lapse Rates

We conduct a lapse study each year to develop a best-estimate lapse assumption. The lapse study is based on actual experience for all LTC policies combined. The current study includes 36,977 lapses on policies from policy anniversaries in 2000 through policy anniversaries in 2017, including 12,434 lapses in durations 8 and later. The exposures and actual lapses close to the implementation of premium rate increases are excluded from this analysis. For non-lifetime benefit periods, lapses exclude policies that have maximized their benefits; a separate study is conducted to develop a best-estimate assumption for policy terminations due to expiration of benefits.

Lapse experience varies by issue age and benefit period (i.e. lifetime benefit period versus non-lifetime benefit periods). We applied judgment to the results of the lapse study to develop the best-estimate lapse assumption. For later durations, we often looked at several durations' experience together to improve credibility. We have also made an effort to reflect that lapse rates seem to increase some at older attained ages.

The current assumptions for lapse rates and policy terminations due to expiration of benefits are provided in Exhibit 1. As shown in this exhibit, currently assumed ultimate lapse rates range from 1.1% to 2.5% based on issue age band and benefit period category. Exhibit 4 provides a comparison of the actual and expected lapse experience, where the expected basis reflects the currently assumed lapse rates (not including policy terminations due to expiration of benefits).

We also conduct a study each year to develop best-estimate assumptions for the additional lapses and benefit reductions associated with premium rate increases. Exhibit 5 provides the total lapses and benefit reductions the company has experienced at different premium rate increase levels from 2005 through 2017. Based on our actual experience, in the year of premium increase notification to policyholders, an additional 1.5% of inforce policyholders is assumed to lapse, and a 2.7% reduction in benefits due to election of reduced benefit options is also assumed.

We have experienced much stronger customer loyalty than anticipated at the time the LTC policy forms were initially priced. The resulting high policy persistency has unfortunately had an adverse impact on loss ratios.

Adverse Selection

Adverse selection of 4.2% in the year of premium increase notification to policyholders, grading down to 0% in the 6th year after the premium increase notification is assumed.

Expenses

Expenses have not been explicitly projected. It is assumed that the originally filed expense assumptions remain appropriate, except that commission rates were reduced in 2008, 2011, 2013, 2016 and 2018 so that total commissions paid before and after past sought nationwide increases in premium are similar. In addition, as part of this premium rate increase process, the company anticipates adjusting commission rates so that the total commissions paid before and after the full amount of the nationwide requested increase in premium are similar.

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The assumptions used in this rate filing are based on actual inforce experience of RiverSource Life and are deemed reasonable for this particular policy form issued with endorsement. These are best-estimate assumptions and do not include any provision for profit or contingencies.

Exhibits 6 through 8 provide the assumptions used in the prior 2007, 2011 and 2013 premium rate increase filings, respectively.

6. Marketing Method

This policy form issued with endorsement was marketed by agents of RiverSource Life.

7. Underwriting Description

This policy form issued with endorsement was fully underwritten with the use of various underwriting tools in addition to the application, which may have included medical records, an attending physician's statement, telephone interview and/or face-to-face assessment.

8. Premiums

Premiums are unisex and payable for life. Premium rates vary by issue age, the initial FCDMB and HCCDMB amounts, the initial maximum lifetime benefit amount, the deductible period, the Benefit Increase Option and marital status at issue.

9. Issue Age Range

The issue ages were from 40 to 79, except for the benefit structures with a 90-day deductible period, 730 x FCDMB or 1,460 x FCDMB initial lifetime maximum benefit amounts and HCCDMB amounts of 50% or 75% of the FCDMB amount which were issued to age 84.

10. Area Factors

Area factors are not used for this product.

11. Premium Modalization Rules

The following modal factors and nationwide percent distributions (based on inforce count as of June 30, 2018) are applied to the annual premium ("AP"):

Premium Mode	Modal Factors	Percent Distribution
Annual	$1.0000 \cdot AP + 0.0$	40.1%
Semi-Annual	$0.5020 \cdot AP + 0.4$	6.1%
Quarterly	$0.2580 \cdot AP + 0.5$	7.1%
Monthly	$0.0868 \cdot AP + 0.6$	46.7%

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12. Active Life Reserves

Active life reserves ("ALR"), although they have significant impact, have not been used in the analysis in this rate filing, except as provided in Exhibits 11 and 12.

13. Trend Assumptions

As this is not medical insurance, explicit medical cost trends have not been included in the projections.

14. Past and Future Policy Experience

Nationwide experience for policy form 30160A, subject to endorsement form 32100, is provided in Exhibit 9, and Virginia experience for policy form 30160A-VA, subject to endorsement form 32100, is provided in Exhibit 10. Exhibits 10 and 11 provide historical nationwide and Virginia experience, respectively, for earned premiums, paid claims and incurred claims, while Exhibit 12 provides historical nationwide and Virginia experience for earned premiums, incurred claims, increase in active life reserves and incurred loss ratios including active life reserves. These exhibits include any previously implemented premium rate increases as described below in section 15.

Note that RiverSource Life does not view Virginia-specific experience as fully credible but is providing it as required.

The proposed premium rates have been developed using nationwide experience.

Historical experience is shown by claim incurral year with the loss ratio for each calendar year. The following formula provides an illustration of the historical incurred loss ratio calculation for each calendar year:

$$ILR_j = \frac{\sum_k \sum_t {}_j Pmt_t^k * v^{t-k} + \sum_k ({}_j CR_{ValDate}^k + {}_j IBNR_{ValDate}^k) * v^{ValDate-k}}{EP_j}$$

ILR_j = incurred loss ratio for year j

${}_j Pmt_t^k$ = claim payments at time t for claims incurred at time k in year j

${}_j CR_{ValDate}^k$ = open claim reserve held on June 30, 2018 for claims incurred at time k in year j

${}_j IBNR_{ValDate}^k$ = incurred but not reported reserve as of June 30, 2018 attributable to claims incurred at time k in year j

EP_j = earned premium in year j

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ValDate = June 30, 2018

j = year of claim incurral

k = date of claim incurral

t = date of claim payment

$v = 1 / 1.045 = 0.956938$

A historical annual paid loss ratio is calculated in Exhibits 11 and 12, without and with interest, as historical paid claims divided by historical earned premiums, and a historical annual incurred loss ratio is calculated in Exhibits 9 through 12, without and with interest, as historical incurred claims divided by historical earned premiums. Historical earned premiums in Exhibits 9 through 12 are calculated based on the issue and, if appropriate, termination date for each policy. Historical paid claims in Exhibits 11 and 12 are calculated as the sum of the actual claim payments made in the calendar year. Historical incurred claims in Exhibits 9 through 12 are determined by discounting claim payments and open claim reserves to the actual original loss date for each claim and by discounting IBNR to the time it is assumed to occur. These items are then summed to produce a total for each calendar year. For purposes of accumulating historical experience for a historical or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

A future annual incurred loss ratio is calculated in Exhibits 9 and 10, without and with interest, as anticipated incurred claims divided by anticipated earned premiums. Anticipated earned premiums, paid claims and incurred claims are projected on a seriatim basis and then summed to produce a total for each calendar year. For purposes of discounting projected future experience for an anticipated or for a lifetime loss ratio calculation, these calendar year totals are assumed to represent a mid-year value.

Lifetime loss ratios in Exhibits 9 and 10 are as of June 30, 2018 and are calculated as the sum of accumulated historical experience and discounted projected future experience where accumulation and discounting of the total for each calendar year occur at 4.5%, which is the average maximum statutory valuation interest rate used for contract reserves determined by weighting the active life reserve balance as of June 30, 2018 by issue year, and assume mid-year values.

The incurred loss ratio in Exhibit 13 is defined as the sum of incurred claims and increase in active life reserves divided by earned premiums. The values in this exhibit are shown without interest accumulation.

Exhibit 14 provides anticipated incurred loss ratios before and after the requested premium rate increase for nationwide and Virginia-specific experience, where the anticipated incurred loss ratio is equal to anticipated incurred claims less policy reserves divided by anticipated earned premiums. The anticipated incurred loss ratios in this exhibit are calculated in a manner consistent with Exhibits 9 and 10.

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15. History of Previous Premium Rate Revisions

Three prior premium rate increases have been approved and implemented on this policy form issued with endorsement in Virginia. A 10% increase was approved in June 2007 and implemented on each policyholder's next policy anniversary beginning in September 2007. A 10% increase was approved in November 2011 and implemented on each policyholder's next policy anniversary beginning in March 2012. A 10% increase was approved in December 2014 and implemented on each policyholder's next policy anniversary beginning in June 2015.

The actual and projected premiums in Exhibits 9, 11 and 12 reflect the accumulated premium rate increases as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis.

16. Requested Premium Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements

The company is requesting a premium rate increase of 40%.

Projected experience assuming the requested premium rate increase is implemented is provided in Exhibits 9 and 10.

Exhibit 15 provides the demonstration that the requested premium rate increase meets the dual-loss ratio standard for individual LTC policy forms set forth in the Bulletin. Actual and projected earned premiums and incurred claims in this exhibit are consistent with those shown in Exhibits 10 and 11.

The reason for the requested premium rate increase is due to a combination of actual lapse and mortality running less than expected in pricing and actual morbidity experience worse than expected for older attained ages. A premium rate increase is considered an effective way to reduce projected losses.

Table 1 shows the isolated impact on the projected lifetime loss ratio of future deviations in each key driver from original assumptions and the corresponding premium rate increase needed to produce the target lifetime loss ratio of 72.3%, which represents the lifetime loss ratio using historical experience combined with projected future experience based on our original pricing assumptions.

Note that Table 1 has been developed using nationwide historical experience through June 30, 2018, where actual and projected premiums reflect the accumulated rate increases as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis, and the loss ratio with all current assumptions corresponds to Exhibit 9 before the requested premium rate increase.

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Table 1
RiverSource Life Insurance Company
Impact on Lifetime Loss Ratio of Changing from Original Pricing to Current Assumptions
Nationwide Experience Before Any Premium Rate Increase
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis
Policy Form 30160A, Subject to Endorsement Form 32100

Assumptions	Lifetime Loss Ratio	Impact on Lifetime Loss Ratio	Premium Rate Increase Needed to Produce a Lifetime Loss Ratio of 72.3%
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions	72.3%	N/A	N/A
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	78.5%	6.2%	47.2%
Mortality	74.6%	2.3%	17.4%
Lapse	91.1%	18.8%	118.0%
Interest	76.2%	3.9%	28.3%
Historical Experience through 6/30/2018 & Projections with All Current Assumptions	109.8%	37.5%	213.4%

Note that the lifetime loss ratio for each changed assumption in Table 1 does not reflect any synergy of the assumptions. As a result, the total impact of all current assumptions on the lifetime loss ratio (i.e. 37.5%) is greater than the sum of the impact of each changed assumption (i.e. $31.2\% = 6.2\% + 2.3\% + 18.8\% + 3.9\%$).

As the results in Table 1 show, a premium rate increase that far exceeds the requested increase is currently actuarially justified. RiverSource Life is requesting a premium rate increase at this time that is lower than the current actuarially justified increase, as we believe that it is appropriate to limit the current premium rate increase request to 40% in order to minimize the impact on policyholders to the extent that we can, with the understanding that the company anticipates seeking additional premium rate increases in the future, even if experience does not deteriorate from current best estimates.

If it is the Bureau's position to only allow future additional premium rate increases if experience deteriorates from current best estimates, we request that the Bureau inform the company prior to approving the requested premium rate increase, as the company would like to amend this filing to request a significantly larger premium rate increase at this time.

Exhibit 16 provides a comparison of the current and proposed premium rates and the percentage increase in the premium rate. The proposed premium rates are equal to 1.4 times the current premium rates, subject to a maximum premium rate of \$999.98.

Premium rate tables with the requested rate increase are provided in Exhibit 17.

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for Policy Form 30160A, Subject to Endorsement Form 32100

December 2018

17. Virginia Average Annual Premium (Based on June 30, 2018 Inforce)

Before rate increase: \$1,822
After rate increase: \$2,550

These values assume all previously approved premium rate increases have been fully implemented on all policies.

18. Proposed Effective Date

The premium rate increase will apply to policies on their policy anniversary date following a 90-day notification period.

19. Nationwide Distribution of Business (Based on June 30, 2018 Inforce Count)

By Issue Age:

Issue Ages	Percent Distribution
<55	39.9%
55-59	28.5%
60-64	20.1%
65-69	8.1%
70-74	2.6%
75-79	0.7%
>79	0.1%

By Deductible Period:

Deductible Period	Percent Distribution
20-day	18.5%
90-day	81.5%

By Benefit Period:

Benefit Period	Percent Distribution
2-Year	2.6%
4-Year	29.1%
6-Year	30.8%
Unlimited	37.5%

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for Policy Form 30160A, Subject to Endorsement Form 32100

December 2018

By Inflation Protection Option:

Inflation Option	Percent Distribution
None	5.3%
Simple	35.4%
Compound	59.3%

By Gender:

Gender	Percent Distribution
Female	60.5%
Male	39.5%

20. Number of Policyholders

As of June 30, 2018, the number of policies and annual premium inforce, assuming all premium rate increases previously approved in Virginia have been fully implemented on all policies in both the state and nationwide, is:

	Number of Insureds	Annual Premium
Virginia	1,501	\$2,734,228
Nationwide	26,844	\$48,408,432

RIVERSOURCE LIFE INSURANCE COMPANY

Address: 227 Ameriprise Financial Center, Minneapolis MN 55474

Actuarial Memorandum for Policy Form 30160A, Subject to Endorsement Form 32100

December 2018

21. Actuarial Certification

I am a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries, and I meet the Academy's qualification standards for preparing health rate filings and to render the actuarial opinion contained herein.

I believe this rate filing is in compliance with the applicable laws of the State of Virginia and with the rules of the Bureau. This Actuarial Memorandum has been prepared in conformity with all applicable Actuarial Standards of Practice, including ASOP No. 8.

I hereby certify that, to the best of my knowledge and judgment, this rate submission is in compliance with the applicable laws and regulations of the State of Virginia. Furthermore, the actuarial assumptions are appropriate. In my opinion, the rates are not excessive or unfairly discriminatory. The premiums are reasonable in relation to the benefits based on the loss ratio standard set forth in 14VAC5-200-150.B.



Anju Gupta-Lavey, FSA, MAAA
Director – Actuary
RiverSource Life Insurance Company
Date: December 12, 2018

Exhibit 1
RiverSource Life Insurance Company
Original Pricing & Current Assumptions Comparison
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions

Original Pricing Assumptions:

RiverSource Life began marketing nursing home policies with a zero-day prior hospitalization requirement in 1989. Using the emerging experience on this business, statistics from the "1985 National Nursing Home Survey" published by the National Center for Health Statistics and input provided from RiverSource Life's reinsurer, the expected frequencies and severities of claims were developed for nursing home benefits for policies with No Benefit Increase Option. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on nursing home claims incidence. It was understood that the underwriting process would include an assessment of functional and cognitive abilities if considered appropriate.

RiverSource Life began marketing home health care benefit riders in 1990. Only limited insured experience was available for home and community care benefits at the time of original pricing. Therefore, the expected claim costs for these benefits were derived from general population data with the assistance of RiverSource Life's reinsurer. Both the incidence rates and the length of home care usage for the first two years were determined through analysis of the "1982-1984 National Long Term Care Surveys", which polled elderly people who manifested impairments in ADLs. The home care incidence rates were modified by loading for cognitive impairment as a benefit trigger.

The data from the "1985 National Nursing Home Survey" was used to extrapolate the length of home care usage after the first two years. Additionally, experience data from continuing care retirement communities was used to verify the claim cost assumptions and to provide guidance in translating general population experience to anticipated insured population experience. Incidence rates by issue age and duration were developed to reflect the effects of underwriting on home care claims incidence.

Claim costs for the Simple and Compound Benefit Increase Options were based on these claim costs with the benefit loaded to reflect the scheduled increases in benefits. The nonforfeiture benefit claim costs were determined by assumptions consistent with those used in establishing premium rates. The above described experience was also used to determine marital discounts.

It should be recognized that considerable judgment was made with respect to expected claim costs, especially for non-institutional benefits. After using all available data, total expected claim costs were developed that represented reasonable estimates of aggregate long term care experience under the applicable underwriting criteria.

The following selection factors were used:

Duration	Issue Age Band			
	40-59	60-69	70-79	80+
1	40%	35%	30%	20%
2	50%	55%	60%	80%
3	55%	60%	75%	100%
4	60%	65%	90%	100%
5	65%	70%	100%	100%
6	70%	75%	100%	100%
7	75%	80%	100%	100%
8	80%	90%	100%	100%
9	90%	100%	100%	100%
10+	100%	100%	100%	100%

Exhibit 1
RiverSource Life Insurance Company
Original Pricing & Current Assumptions Comparison
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions							
Current Assumptions:							
Currently assumed claim costs are the product of original pricing expected claim costs and actual-to-expected morbidity adjustment factor. The company took steps beginning in 2003 to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible, which is reflected in a 5% reduction in expected claim costs for 2004 and later. The morbidity actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2017.							
Lifetime Benefit Period Morbidity Actual-to-Expected Adjustment Factors							
Duration	Issue Age Band						
	<53	53-57	58-62	63-67	68-72	73-77	78+
1	0.050	0.850	0.430	1.500	1.160	1.590	2.630
2	0.050	0.850	0.430	1.500	1.160	1.590	2.630
3	0.050	0.850	0.430	1.500	1.160	1.590	2.630
4	0.098	0.768	0.430	1.458	1.226	1.594	2.568
5	0.146	0.686	0.430	1.416	1.292	1.598	2.506
6	0.194	0.604	0.430	1.374	1.358	1.602	2.444
7	0.242	0.522	0.430	1.332	1.424	1.606	2.382
8	0.290	0.440	0.430	1.290	1.490	1.610	2.320
9	0.298	0.510	0.552	1.368	1.608	1.638	2.330
10	0.306	0.580	0.674	1.446	1.726	1.666	2.340
11	0.314	0.650	0.796	1.524	1.844	1.694	2.350
12	0.322	0.720	0.918	1.602	1.962	1.722	2.360
13	0.330	0.790	1.040	1.680	2.080	1.750	2.370
14	0.380	0.804	1.100	1.728	2.078	1.788	2.332
15	0.430	0.818	1.160	1.776	2.076	1.826	2.294
16	0.480	0.832	1.220	1.824	2.074	1.864	2.256
17	0.530	0.846	1.280	1.872	2.072	1.902	2.218
18	0.580	0.860	1.340	1.920	2.070	1.940	2.180
19	0.606	0.884	1.378	1.928	2.070	1.966	2.180
20	0.632	0.908	1.416	1.936	2.070	1.992	2.180
21	0.658	0.932	1.454	1.944	2.070	2.018	2.180
22	0.684	0.956	1.492	1.952	2.070	2.044	2.180
23	0.710	0.980	1.530	1.960	2.070	2.070	2.180
24	0.764	1.002	1.530	1.960	2.070	2.092	2.180
25	0.818	1.024	1.530	1.960	2.070	2.114	2.180
26	0.872	1.046	1.530	1.960	2.070	2.136	2.180
27	0.926	1.068	1.530	1.960	2.070	2.158	2.180
28	0.980	1.090	1.530	1.960	2.070	2.180	2.180
29	0.993	1.102	1.530	1.959	2.067	2.190	2.177
30	1.007	1.113	1.530	1.958	2.063	2.200	2.173
31	1.020	1.125	1.530	1.958	2.060	2.210	2.170
32	1.033	1.137	1.530	1.957	2.057	2.220	2.167
33	1.047	1.148	1.530	1.956	2.053	2.230	2.163
34	1.060	1.160	1.530	1.955	2.050	2.240	2.160
35	1.073	1.172	1.530	1.954	2.047	2.250	2.157
36	1.087	1.183	1.530	1.953	2.043	2.260	2.153
37	1.100	1.195	1.530	1.953	2.040	2.270	2.150
38	1.113	1.207	1.530	1.952	2.037	2.280	2.147
39	1.127	1.218	1.530	1.951	2.033	2.290	2.143
40+	1.140	1.230	1.530	1.950	2.030	2.300	2.140

Exhibit 1
RiverSource Life Insurance Company
Original Pricing & Current Assumptions Comparison
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions								
Current Assumptions:								
Non-Lifetime Benefit Periods Morbidity Actual-to-Expected Adjustment Factors								
Duration	Issue Age Band							
	<53	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.210	0.100	0.430	0.370	0.570	1.060	0.670	2.210
2	0.210	0.100	0.430	0.370	0.570	1.060	0.670	2.210
3	0.210	0.100	0.430	0.370	0.570	1.060	0.670	2.210
4	0.234	0.164	0.492	0.462	0.736	1.200	1.114	2.322
5	0.258	0.228	0.554	0.554	0.902	1.340	1.558	2.434
6	0.282	0.292	0.616	0.646	1.068	1.480	2.002	2.546
7	0.306	0.356	0.678	0.738	1.234	1.620	2.446	2.658
8	0.330	0.420	0.740	0.830	1.400	1.760	2.890	2.770
9	0.348	0.444	0.814	0.970	1.456	1.960	2.894	2.772
10	0.366	0.468	0.888	1.110	1.512	2.160	2.898	2.774
11	0.384	0.492	0.962	1.250	1.568	2.360	2.902	2.776
12	0.402	0.516	1.036	1.390	1.624	2.560	2.906	2.778
13	0.420	0.540	1.110	1.530	1.680	2.760	2.910	2.780
14	0.446	0.562	1.128	1.542	1.714	2.694	2.922	2.792
15	0.472	0.584	1.146	1.554	1.748	2.628	2.934	2.804
16	0.498	0.606	1.164	1.566	1.782	2.562	2.946	2.816
17	0.524	0.628	1.182	1.578	1.816	2.496	2.958	2.828
18	0.550	0.650	1.200	1.590	1.850	2.430	2.970	2.840
19	0.566	0.688	1.206	1.588	1.858	2.416	2.964	2.840
20	0.582	0.726	1.212	1.586	1.866	2.402	2.958	2.840
21	0.598	0.764	1.218	1.584	1.874	2.388	2.952	2.840
22	0.614	0.802	1.224	1.582	1.882	2.374	2.946	2.840
23	0.630	0.840	1.230	1.580	1.890	2.360	2.940	2.840
24	0.672	0.862	1.230	1.580	1.890	2.350	2.940	2.840
25	0.714	0.884	1.230	1.580	1.890	2.340	2.940	2.840
26	0.756	0.906	1.230	1.580	1.890	2.330	2.940	2.840
27	0.798	0.928	1.230	1.580	1.890	2.320	2.940	2.840
28	0.840	0.950	1.230	1.580	1.890	2.310	2.940	2.840
29	0.858	0.960	1.231	1.580	1.889	2.308	2.937	2.835
30	0.877	0.970	1.232	1.580	1.888	2.307	2.933	2.830
31	0.895	0.980	1.233	1.580	1.888	2.305	2.930	2.825
32	0.913	0.990	1.233	1.580	1.887	2.303	2.927	2.820
33	0.932	1.000	1.234	1.580	1.886	2.302	2.923	2.815
34	0.950	1.010	1.235	1.580	1.885	2.300	2.920	2.810
35	0.968	1.020	1.236	1.580	1.884	2.298	2.917	2.805
36	0.987	1.030	1.237	1.580	1.883	2.297	2.913	2.800
37	1.005	1.040	1.238	1.580	1.883	2.295	2.910	2.795
38	1.023	1.050	1.238	1.580	1.882	2.293	2.907	2.790
39	1.042	1.060	1.239	1.580	1.881	2.292	2.903	2.785
40+	1.060	1.070	1.240	1.580	1.880	2.290	2.900	2.780
The following adverse selection factors are used:								
First Year of Premium Increase Notification	Adverse Selection Factor							
1	4.20%							
2	3.20%							
3	2.20%							
4	1.20%							
5	0.20%							
6	0.00%							

Exhibit 1
RiverSource Life Insurance Company
Original Pricing & Current Assumptions Comparison
Policy Form 30160A, Subject to Endorsement Form 32100

Mortality Assumptions						
Original Pricing Assumptions:						
1983 Individual Annuity Mortality Basic Table						
Current Assumptions:						
1983 Individual Annuity Mortality Basic Table with A/E adjustment factors consistent with experience						
Mortality Actual-to-Expected Adjustment Factors						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	40%	40%	40%
4	40%	50%	45%	45%	45%	45%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	50%	55%	60%	60%	65%	65%
8	50%	55%	60%	60%	70%	75%
9	50%	55%	66%	71%	73%	88%
10	54%	66%	66%	74%	73%	88%
11	54%	66%	70%	78%	74%	88%
12	54%	66%	70%	78%	86%	89%
13	54%	66%	70%	82%	86%	92%
14	54%	66%	70%	85%	86%	92%
15	54%	66%	72%	85%	93%	94%
16	54%	66%	77%	85%	93%	99%
17	60%	67%	77%	87%	97%	99%
18	60%	67%	80%	95%	101%	100%
19	60%	71%	80%	95%	101%	100%
20	60%	71%	83%	95%	101%	103%
21	66%	77%	83%	96%	110%	106%
22	67%	82%	90%	108%	110%	110%
23	68%	82%	90%	108%	110%	110%
24	79%	84%	90%	108%	110%	110%
25	83%	84%	94%	108%	110%	110%
26	84%	86%	102%	108%	110%	110%
27	85%	95%	102%	108%	110%	110%
28	90%	97%	102%	108%	110%	110%
29	90%	97%	102%	108%	110%	110%
30	90%	100%	102%	108%	110%	110%
31	90%	100%	102%	108%	110%	110%
32	95%	100%	102%	108%	110%	110%
33	95%	100%	102%	108%	110%	110%
34	95%	100%	102%	108%	110%	110%
35+	100%	100%	102%	108%	110%	110%

Exhibit 1
RiverSource Life Insurance Company
Original Pricing & Current Assumptions Comparison
Policy Form 30160A, Subject to Endorsement Form 32100

Lapse Assumptions							
Original Pricing Assumptions:							
	Issue Age						
Duration	45	55	65	75	82		
1	10%	9%	8%	7%	6%		
2	9%	8%	7%	6%	5%		
3	8%	7%	6%	5%	4%		
4	7%	6%	5%	4%	3%		
5	6%	5%	5%	4%	3%		
6+	5%	5%	5%	4%	3%		
Current Assumptions:							
Lifetime Benefit Period				Non-Lifetime Benefit Periods			
	Issue Age Band				Issue Age Band		
Duration	<63	63-72	73+	Duration	<63	63-72	73+
1	7.02%	7.00%	7.15%	1	6.86%	7.04%	5.30%
2	6.60%	4.75%	3.60%	2	5.92%	4.78%	4.60%
3	4.89%	3.67%	3.60%	3	4.11%	3.29%	3.05%
4	3.69%	2.75%	1.90%	4	3.06%	2.84%	2.88%
5	2.68%	2.00%	1.40%	5	2.29%	1.92%	2.10%
6	1.90%	1.70%	1.40%	6	1.70%	1.84%	1.90%
7	1.52%	1.16%	1.40%	7	1.48%	1.41%	1.70%
8	1.11%	1.16%	1.30%	8	1.15%	1.36%	1.70%
9	1.07%	1.16%	1.10%	9	1.05%	1.24%	1.70%
10	0.89%	1.16%	1.10%	10	0.90%	1.20%	1.98%
11	0.88%	1.16%	1.10%	11	0.90%	1.20%	1.98%
12	0.65%	0.87%	1.40%	12	0.90%	1.15%	2.10%
13	0.65%	0.87%	1.40%	13	0.74%	1.15%	2.10%
14	0.65%	0.87%	1.45%	14	0.74%	1.15%	2.20%
15	0.65%	0.98%	1.45%	15	0.73%	1.15%	2.20%
16	0.60%	0.98%	1.75%	16	0.73%	1.15%	2.50%
17	0.60%	0.98%	1.75%	17	0.73%	1.25%	2.50%
18	0.56%	1.20%	1.80%	18	0.87%	1.25%	2.50%
19	0.56%	1.20%	1.80%	19	0.87%	1.65%	2.50%
20	0.56%	1.20%	1.90%	20	0.87%	1.85%	2.50%
21	0.65%	1.20%	1.90%	21	0.90%	1.75%	2.50%
22	0.75%	1.20%	2.00%	22	0.95%	1.90%	2.50%
23	0.80%	1.20%	2.00%	23	1.00%	1.90%	2.50%
24	0.85%	1.25%	2.00%	24	1.10%	1.90%	2.50%
25	0.90%	1.25%	2.00%	25	1.10%	1.90%	2.50%
26	0.95%	1.25%	2.00%	26	1.20%	1.90%	2.50%
27	1.00%	1.25%	2.00%	27	1.30%	1.90%	2.50%
28	1.00%	1.25%	2.00%	28	1.40%	1.90%	2.50%
29	1.00%	1.25%	2.00%	29	1.40%	1.90%	2.50%
30	1.00%	1.30%	2.00%	30	1.40%	1.90%	2.50%
31	1.10%	1.30%	2.00%	31	1.40%	1.90%	2.50%
32	1.10%	1.30%	2.00%	32	1.40%	1.90%	2.50%
33	1.10%	1.30%	2.00%	33	1.40%	1.90%	2.50%
34	1.10%	1.30%	2.00%	34	1.40%	1.90%	2.50%
35	1.10%	1.35%	2.00%	35	1.40%	1.90%	2.50%
36	1.10%	1.35%	2.00%	36	1.40%	1.90%	2.50%
37	1.10%	1.35%	2.00%	37	1.40%	1.90%	2.50%
38	1.10%	1.35%	2.00%	38	1.40%	1.90%	2.50%
39	1.10%	1.35%	2.00%	39	1.40%	1.90%	2.50%
40+	1.10%	1.40%	2.00%	40+	1.40%	1.90%	2.50%
In the first year of premium increase notification to policyholders, an additional 1.5% of inforce policyholders is assumed to lapse, and a 2.7% reduction in benefits due to election of reduced benefit options is also assumed.							

Exhibit 1
RiverSource Life Insurance Company
Original Pricing & Current Assumptions Comparison
Policy Form 30160A, Subject to Endorsement Form 32100

Benefit Expiry Assumptions for Policies with Non-Lifetime Benefit Periods				
Original Pricing Assumptions: N/A				
Current Assumptions:	Issue Age Band			
	Duration	<63	63-72	73+
	1	0.00%	0.00%	0.00%
	2	0.00%	0.00%	0.00%
	3	0.00%	0.00%	0.00%
	4	0.00%	0.00%	0.02%
	5	0.00%	0.00%	0.10%
	6	0.00%	0.02%	0.20%
	7	0.00%	0.05%	0.54%
	8	0.00%	0.05%	0.57%
	9	0.00%	0.08%	0.73%
	10	0.01%	0.10%	1.19%
	11	0.01%	0.10%	1.45%
	12	0.01%	0.20%	1.65%
	13	0.02%	0.20%	1.65%
	14	0.02%	0.20%	2.40%
	15	0.02%	0.42%	2.40%
	16	0.02%	0.42%	2.60%
	17	0.02%	0.55%	2.60%
	18	0.05%	0.55%	3.40%
	19	0.05%	0.70%	3.50%
	20	0.05%	0.85%	3.60%
	21	0.15%	1.10%	3.60%
	22	0.15%	1.20%	3.60%
	23	0.20%	1.60%	3.60%
	24	0.20%	1.60%	3.60%
	25	0.30%	1.85%	3.60%
	26	0.30%	2.00%	3.60%
	27	0.30%	2.10%	3.60%
	28	0.60%	2.30%	3.60%
	29	1.00%	2.50%	3.60%
	30	1.20%	2.60%	3.60%
	31	1.50%	2.60%	3.60%
	32	1.70%	2.60%	3.60%
	33	1.80%	2.60%	3.60%
	34	1.90%	2.60%	3.60%
	35	2.00%	2.60%	3.60%
	36+	2.10%	2.60%	3.60%

Interest Rate Assumptions	
Original Pricing Assumption:	5.00%
Current Assumption:	4.50%

Exhibit 2
RiverSource Life Insurance Company
Nationwide Long Term Care Claim Experience
For Policy Anniversaries through 2017
Policy Form 30160A, Subject to Endorsement Form 32100
Expected Claims Based on Current Assumptions

SPLIT BY BENEFIT PERIOD AND DURATION								
Duration	Lifetime Benefit Period			Non-Lifetime Benefit Periods			All	
	Actual	Expected	A/E	Actual	Expected	A/E	Actual	Expected
1	669,451	1,117,334	59.9%	197,412	777,664	25.4%	866,864	1,894,998
2	1,538,556	1,761,352	87.4%	978,154	1,419,936	68.9%	2,516,710	3,181,289
3	510,274	2,110,960	24.2%	2,195,986	1,808,332	121.4%	2,706,260	3,919,292
4	4,066,195	2,543,255	159.9%	2,610,310	2,723,998	95.8%	6,676,505	5,267,253
5	3,982,466	2,965,419	134.3%	2,987,095	3,869,794	77.2%	6,969,560	6,835,213
6	2,271,909	3,506,222	64.8%	6,653,174	5,214,111	127.6%	8,925,083	8,720,333
7	6,097,840	4,096,853	148.8%	5,526,709	6,837,175	80.8%	11,624,549	10,934,028
8	3,234,627	4,770,949	67.8%	7,694,183	8,797,217	87.5%	10,928,811	13,568,165
9	6,131,276	6,029,646	101.7%	12,870,780	10,775,483	119.4%	19,002,056	16,805,130
10	6,347,290	7,596,992	83.6%	11,595,550	13,022,851	89.0%	17,942,839	20,619,843
11	10,467,216	9,089,533	115.2%	13,777,255	15,377,501	89.6%	24,244,471	24,467,034
12	10,117,994	10,795,848	93.7%	18,342,041	17,882,138	102.6%	28,460,035	28,677,985
13	11,297,480	12,854,459	87.9%	19,548,711	20,671,489	94.6%	30,846,192	33,525,948
14	12,619,029	14,811,748	85.2%	27,297,569	22,683,448	120.3%	39,916,599	37,495,196
15	18,325,509	16,319,901	112.3%	23,585,999	24,015,363	98.2%	41,911,508	40,335,263
16	14,133,124	12,263,802	115.2%	17,784,601	16,852,774	105.5%	31,917,726	29,116,576
17	6,391,309	5,540,358	115.4%	5,561,213	6,623,926	84.0%	11,952,522	12,164,284
Total	118,201,545	118,174,631	100.0%	179,206,745	179,353,198	99.9%	297,408,290	297,527,829

SPLIT BY ISSUE AGE				
Issue Age	Actual	Expected	A/E	Claim Count
<43	1,575,022	310,316	507.6%	7
43-47	1,559,480	1,974,320	79.0%	28
48-52	8,635,079	8,971,159	96.3%	98
53-57	29,811,996	31,686,143	94.1%	310
58-62	61,236,667	61,812,481	99.1%	722
63-67	82,148,288	81,941,431	100.3%	885
68-72	55,699,277	54,635,922	101.9%	770
73-77	40,262,689	39,903,179	100.9%	588
78-82	14,748,227	14,679,517	100.5%	215
83+	1,731,565	1,613,361	107.3%	29
Total	297,408,290	297,527,829	100.0%	3,652

Exhibit 3
RiverSource Life Insurance Company
Long-Term Care Mortality Experience
For Policy Anniversaries in 2000 through Policy Anniversaries in 2017
Experience Includes All Long-Term Care Forms Combined
Expressing Deaths in Terms of Policy Count
Expected Deaths Based on Current Assumptions

SUMMARY BY DURATION				
Duration	Actual Deaths	Expected Deaths	A/E	Difference
1	100	98	102%	2
2	216	218	99%	(2)
3	418	399	105%	19
4	531	544	98%	(13)
5	811	799	101%	12
6	1,130	1,114	101%	16
7	1,473	1,433	103%	40
8	1,733	1,725	100%	8
9	2,155	2,173	99%	(18)
10	2,639	2,651	100%	(12)
11	3,204	3,181	101%	23
12	3,474	3,477	100%	(3)
13	3,658	3,656	100%	2
14	3,791	3,802	100%	(11)
15	3,893	3,972	98%	(79)
16	3,930	3,929	100%	1
17	3,810	3,840	99%	(30)
18	3,677	3,673	100%	4
19	3,271	3,286	100%	(15)
20	2,890	2,894	100%	(4)
21	2,670	2,660	100%	10
22	2,265	2,239	101%	26
23	1,757	1,731	101%	26
24	1,335	1,359	98%	(24)
25	1,008	1,037	97%	(29)
26	735	745	99%	(10)
27	435	415	105%	20
28	73	60	122%	13
Total	57,082	57,112	100%	(30)

SUMMARY BY ISSUE AGE				
Issue Age	Actual Deaths	Expected Deaths	A/E	Difference
<43	34	38	90%	(4)
43-47	209	228	92%	(19)
48-52	1,545	1,572	98%	(27)
53-57	4,768	4,661	102%	107
58-62	10,722	10,761	100%	(39)
63-67	15,081	15,065	100%	16
68-72	13,439	13,466	100%	(27)
73-77	8,027	8,015	100%	12
78-82	2,890	2,930	99%	(40)
83+	367	375	98%	(8)
Total	57,082	57,112	100%	(30)

SUMMARY BY ALL DURATION / ISSUE AGE CELLS			
Actual Deaths	Expected Deaths	A/E	Difference
57,082	57,112	100%	(30)

Exhibit 4
RiverSource Life Insurance Company
Long-Term Care Lapse Experience (Excludes Policy Terminations due to Expiration of Benefits)
For Policy Anniversaries in 2000 through Policy Anniversaries in 2017
Experience Includes All Long-Term Care Forms Combined
Expressing Lapses in Terms of Policy Count
Expected Lapses Based on Current Assumptions

LIFETIME BENEFIT PERIOD																				
Duration	Issue Ages 35-62					Issue Ages 63-72					Issue Ages 73+					All Issue Ages				
	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected
1	1,358	19,350	7.0%	7.0%	100%	263	3,720	7.1%	7.0%	101%	37	516	7.2%	7.2%	100%	1,658	23,585	7.0%	7.0%	100%
2	1,669	25,282	6.6%	6.6%	100%	265	5,631	4.7%	4.8%	99%	30	833	3.6%	3.6%	100%	1,964	31,746	6.2%	6.2%	100%
3	1,552	31,726	4.9%	4.9%	100%	287	7,814	3.7%	3.7%	100%	42	1,169	3.6%	3.6%	100%	1,881	40,709	4.6%	4.6%	100%
4	1,416	38,350	3.7%	3.7%	100%	265	9,674	2.7%	2.8%	100%	29	1,440	2.0%	1.9%	106%	1,710	49,464	3.5%	3.5%	100%
5	1,271	47,402	2.7%	2.7%	100%	254	12,697	2.0%	2.0%	100%	27	1,959	1.4%	1.4%	98%	1,552	62,058	2.5%	2.5%	100%
6	972	51,229	1.9%	1.9%	100%	254	14,944	1.7%	1.7%	100%	31	2,421	1.3%	1.4%	91%	1,257	68,594	1.8%	1.8%	100%
7	787	51,757	1.5%	1.5%	100%	197	16,094	1.2%	1.2%	106%	47	2,693	1.7%	1.4%	125%	1,031	70,544	1.5%	1.4%	102%
8	554	49,966	1.1%	1.1%	100%	196	16,780	1.2%	1.2%	101%	38	2,793	1.4%	1.3%	105%	788	69,539	1.1%	1.1%	100%
9	498	46,551	1.1%	1.1%	100%	187	16,901	1.1%	1.2%	95%	31	2,821	1.1%	1.1%	100%	716	66,273	1.1%	1.1%	99%
10	375	42,022	0.9%	0.9%	100%	211	17,120	1.2%	1.2%	106%	32	2,882	1.1%	1.1%	101%	618	62,025	1.0%	1.0%	102%
11	360	40,973	0.9%	0.9%	100%	200	18,840	1.1%	1.2%	92%	34	3,255	1.0%	1.1%	95%	594	63,067	0.9%	1.0%	97%
12	245	36,470	0.7%	0.7%	103%	155	17,794	0.9%	0.9%	100%	43	2,981	1.4%	1.4%	103%	443	57,245	0.8%	0.8%	102%
13	234	34,465	0.7%	0.7%	104%	144	16,287	0.9%	0.9%	102%	32	2,531	1.3%	1.4%	90%	410	53,283	0.8%	0.8%	102%
14	212	32,699	0.6%	0.7%	100%	119	14,128	0.8%	0.9%	97%	31	1,985	1.6%	1.5%	108%	362	48,812	0.7%	0.7%	99%
15	179	29,749	0.6%	0.7%	93%	116	11,688	1.0%	1.0%	101%	20	1,500	1.3%	1.5%	92%	315	42,937	0.7%	0.8%	96%
16	159	26,526	0.6%	0.6%	100%	96	9,859	1.0%	1.0%	99%	25	1,140	2.2%	1.8%	125%	280	37,524	0.7%	0.7%	102%
17	147	25,596	0.6%	0.6%	96%	91	9,424	1.0%	1.0%	99%	23	975	2.4%	1.8%	135%	261	35,994	0.7%	0.7%	99%
18	134	22,805	0.6%	0.6%	105%	100	8,088	1.2%	1.2%	103%	19	708	2.7%	1.8%	149%	253	31,600	0.8%	0.8%	107%
19	95	19,446	0.5%	0.6%	87%	73	6,264	1.2%	1.2%	97%	6	469	1.3%	1.8%	71%	174	26,178	0.7%	0.7%	90%
20	91	15,558	0.6%	0.6%	104%	61	5,138	1.2%	1.2%	99%	5	327	1.5%	1.9%	80%	157	21,023	0.7%	0.7%	101%
21	79	13,278	0.6%	0.7%	92%	63	5,160	1.2%	1.2%	102%	9	292	3.1%	1.9%	162%	151	18,730	0.8%	0.8%	98%
22	75	9,334	0.8%	0.8%	107%	43	4,492	1.0%	1.2%	80%	9	263	3.4%	2.0%	171%	127	14,088	0.9%	0.9%	98%
23	40	6,007	0.7%	0.8%	83%	37	3,091	1.2%	1.2%	100%	5	145	3.5%	2.0%	173%	82	9,244	0.9%	1.0%	93%
24	38	3,777	1.0%	0.9%	118%	41	2,044	2.0%	1.3%	160%	3	75	4.0%	2.0%	200%	82	5,896	1.4%	1.0%	139%
25	25	2,334	1.1%	0.9%	119%	22	1,281	1.7%	1.3%	137%	2	39	5.1%	2.0%	257%	49	3,655	1.3%	1.0%	130%
26	10	1,767	0.6%	1.0%	60%	14	1,007	1.4%	1.3%	111%	0	30	0.0%	2.0%	0%	24	2,805	0.9%	1.1%	80%
27	10	593	1.7%	1.0%	169%	6	332	1.8%	1.3%	144%	0	7	0.0%	2.0%	0%	16	933	1.7%	1.1%	156%
28	0	99	0.0%	1.0%	0%	0	38	0.0%	1.3%	0%	0	1	0.0%	2.0%	0%	0	139	0.0%	1.1%	0%
All Durations	12,585	725,111	1.7%	1.7%	100%	3,760	256,330	1.5%	1.5%	100%	610	36,249	1.7%	1.6%	105%	16,955	1,017,690	1.7%	1.7%	100%
Durations 8 and later	3,560	460,014	0.8%	0.8%	100%	1,975	185,757	1.1%	1.1%	100%	367	25,218	1.5%	1.4%	107%	5,902	670,989	0.9%	0.9%	100%

NON-LIFETIME BENEFIT PERIODS																				
Duration	Issue Ages 35-62					Issue Ages 63-72					Issue Ages 73+					All Issue Ages				
	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected	Lapses	Actual Exposure	Rate	Expected Lapse Rate	Actual / Expected
1	1,941	28,299	6.9%	6.9%	100%	683	9,710	7.0%	7.0%	100%	116	2,176	5.3%	5.3%	101%	2,740	40,185	6.8%	6.8%	100%
2	2,079	35,117	5.9%	5.9%	100%	644	13,479	4.8%	4.8%	100%	151	3,289	4.6%	4.6%	100%	2,874	51,884	5.5%	5.5%	100%
3	1,599	38,925	4.1%	4.1%	100%	542	16,450	3.3%	3.3%	100%	128	4,198	3.0%	3.1%	100%	2,269	59,572	3.8%	3.8%	100%
4	1,227	40,039	3.1%	3.1%	100%	503	17,692	2.8%	2.8%	100%	133	4,623	2.9%	2.9%	100%	1,863	62,354	3.0%	3.0%	100%
5	977	42,609	2.3%	2.3%	100%	390	20,343	1.9%	1.9%	100%	122	5,582	2.2%	2.1%	104%	1,489	68,535	2.2%	2.2%	100%
6	719	42,322	1.7%	1.7%	100%	406	22,124	1.8%	1.8%	100%	117	6,415	1.8%	1.9%	96%	1,242	70,860	1.8%	1.8%	99%
7	585	39,534	1.5%	1.5%	100%	315	22,297	1.4%	1.4%	100%	113	6,670	1.7%	1.7%	100%	1,013	68,500	1.5%	1.5%	100%
8	437	37,990	1.2%	1.2%	100%	305	22,368	1.4%	1.4%	100%	116	6,590	1.8%	1.7%	104%	858	66,947	1.3%	1.3%	101%
9	384	36,945	1.0%	1.1%	99%	272	21,999	1.2%	1.2%	100%	103	6,301	1.6%	1.7%	96%	759	65,245	1.2%	1.2%	99%
10	275	31,771	0.9%	0.9%	96%	207	20,515	1.0%	1.2%	84%	117	5,862	2.0%	2.0%	101%	599	58,147	1.0%	1.1%	92%
11	264	28,952	0.9%	0.9%	101%	271	20,426	1.3%	1.2%	111%	113	5,733	2.0%	2.0%	100%	648	55,110	1.2%	1.1%	105%
12	255	27,535	0.9%	0.9%	103%	220	19,259	1.1%	1.2%	99%	111	5,039	2.2%	2.1%	105%	586	51,833	1.1%	1.1%	102%
13	213	28,680	0.7%	0.7%	100%	217	18,422	1.2%	1.2%	102%	85	4,364	1.9%	2.1%	93%	515	51,466	1.0%	1.0%	100%
14	205	27,025	0.8%	0.7%	103%	182	16,526	1.1%	1.2%	96%	87	3,502	2.5%	2.2%	113%	474	47,053	1.0%	1.0%	101%
15	166	24,458	0.7%	0.7%	93%	168	14,283	1.2%	1.2%	102%	56	2,641	2.1%	2.2%	96%	390	41,382	0.9%	1.0%	97%
16	143	20,482	0.7%	0.7%	96%	136	11,910	1.1%	1.2%	99%	49	2,040	2.4%	2.5%	96%	328	34,433	1.0%	1.0%	97%
17	122	16,771	0.7%	0.7%	100%	137	10,402	1.3%	1.3%	105%	34	1,641	2.1%	2.5%	83%	293	28,814	1.0%	1.0%	100%
18	120	12,852	0.9%	0.9%	107%	99	8,358	1.2%	1.3%	95%	37	1,175	3.1%	2.5%	126%	256	22,385	1.1%	1.1%	104%
19	77	9,375	0.8%	0.9%	94%	102	6,179	1.7%	1.7%	100%	25	756	3.3%	2.5%	132%	204	16,310	1.3%	1.2%	101%
20	54	7,093	0.8%	0.9%	88%	89	4,855	1.8%	1.9%	99%	13	525	2.5%	2.5%	99%	156	12,473	1.3%	1.3%	95%
21	63	5,952	1.1%	0.9%	118%	81	4,400	1.8%	1.8%	105%	11	402	2.7%	2.5%	109%	155	10,754	1.4%	1.3%	110%
22	40	4,204	1.0%	1.0%	100%	59	3,422	1.7%	1.9%	91%	8	281	2.9%	2.5%	114%	107	7,907	1.4%	1.4%	96%
23	26	2,774	0.9%	1.0%	94%	46	2,324	2.0%	1.9%	104%	6	140	4.3%	2.5%	172%	78	5,238	1.5%	1.4%	103%
24	18	1,818	1.0%	1.1%	90%	25	1,488	1.7%	1.9%	88%	5	67	7.5%	2.5%	299%	48	3,373	1.4%	1.5%	96%
25	18	1,035	1.7%	1.1%	158%	19	938	2.0%	1.9%	107%	0	38	0.0%	2.5%	0%	37	2,010	1.8%	1.5%	123%
26	8	709	1.1%	1.2%	94%	18	653	2.8%	1.9%	145%	2	20	10.1%	2.5%	405%	28	1,383	2.0%	1.5%	131%
27	3	225	1.3%	1.3%	103%	5	200	2.5%	1.9%	132%	0	4	0.0%	2.5%	0%	8	429	1.9%	1.6%	117%
28	3	50	6.0%	1.4%	428%	2	22	9.0%	1.9%	476%	0	0	0.0%	0.0%	0%	5	72	6.9%	1.6%	446%
All Durations	12,021	593,541	2.0%	2.0%	100%	6,143	331,044	1.9%	1.9%	100%	1,858	80,071	2.3%	2.3%	101%	20,022	1,004,656	2.0%	2.0%	100%
Durations 8 and later	2,894	326,697	0.9%	0.9%	100%	2,660	208,948	1.3%	1.3%	100%	978	47,120	2.1%	2.0%	102%	6,532	582,765	1.1%	1.1%	100%

Exhibit 5
RiverSource Life Insurance Company
Lapses and Benefit Reductions¹
Nationwide Experience
Experience Includes All Long-Term Care Forms Combined

Total Lapses in Year of Rate Increase															
Increase Percent	Average Increase	Year of Increase													Weighted Average
		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	
< 10%	6.9%			0.9%	1.5%	1.3%	0.7%	1.2%	0.9%	0.7%	1.0%	0.3%	1.4%	0.3%	1.1%
10% - 14.9%	10.8%	0.7%	0.0%	1.4%	1.6%	2.0%	1.3%	1.3%	1.1%	1.0%	0.7%	0.7%	0.5%	0.5%	1.2%
15% - 19.9%	15.4%	0.7%	2.5%	1.4%	1.7%	1.8%	1.4%	1.2%	1.2%	1.2%	1.1%	1.1%	1.0%	1.0%	1.4%
20% - 29.9%	22.3%	1.8%	1.6%	1.2%	1.6%	2.5%		4.4%	2.2%	1.6%	1.9%	0.5%	0.6%	0.9%	1.4%
30%+	28.9%	2.9%	2.6%	2.2%	2.9%	2.2%	1.4%	1.1%	0.8%	1.0%		1.4%	0.6%	0.3%	2.5%
Total	16.4%	2.6%	2.4%	1.2%	1.8%	1.9%	1.4%	1.2%	1.2%	1.1%	1.0%	1.0%	0.9%	0.9%	1.5%

Overall Reduction in Benefits in Relation to Rate Increase Percentage															
Increase Percent	Average Increase	Year of Increase													Weighted Average
		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	
< 10%	6.9%			0.3%	0.2%	0.2%	0.3%	0.3%	0.3%	0.3%	0.3%	0.2%	0.0%	0.0%	0.3%
10% - 14.9%	10.8%	0.6%	1.2%	0.5%	0.4%	0.5%	0.5%	0.5%	0.5%	0.6%	0.4%	0.4%	0.2%	0.3%	0.5%
15% - 19.9%	15.4%	1.1%	0.8%	0.5%	0.7%	0.8%	0.7%	0.8%	0.8%	0.9%	0.8%	0.9%	0.8%	0.8%	0.8%
20% - 29.9%	22.3%	1.6%	1.7%	1.7%	1.3%	2.4%		1.7%	1.0%	1.0%	1.0%	1.3%	1.2%	1.2%	1.4%
30%+	28.9%	2.6%	2.3%	2.1%	2.1%	2.0%	1.5%	1.4%	1.2%	1.0%		1.9%	1.9%	2.1%	2.3%
Total	16.4%	1.4%	1.3%	0.8%	0.7%	0.8%	0.7%	0.8%	0.8%	0.9%	0.7%	0.9%	0.8%	0.8%	0.9%

¹ The total percent reduction in benefit is typically no more than the percentage increase in premium.

Exhibit 6
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions	
Currently assumed claim costs are the product of original pricing expected claim costs and actual-to-expected morbidity adjustment factor. The company took steps beginning in 2003 to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible, which is reflected in a 5% reduction in expected claim costs for 2004 and later. The morbidity actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending September 2005.	
Actual-to-Expected Adjustment Factors	
Duration	Actual-to-Expected Factor
1	0.600
2	0.650
3	0.700
4	0.750
5	0.800
6	0.850
7	0.900
8	0.950
9	1.000
10+	1.000

Exhibit 6
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Mortality Assumptions						
1983 Individual Annuity Mortality Basic Table with A/E adjustment factors consistent with experience						
Mortality Selection Factors						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	20%	20%	20%	20%
2	25%	25%	30%	30%	25%	25%
3	35%	35%	45%	50%	35%	35%
4	45%	45%	45%	50%	35%	35%
5	50%	50%	45%	50%	40%	40%
6	55%	55%	55%	60%	70%	75%
7	55%	55%	55%	65%	75%	75%
8	55%	55%	60%	65%	75%	75%
9	55%	55%	75%	80%	85%	85%
10	80%	80%	75%	80%	85%	85%
11	80%	80%	75%	85%	85%	95%
12	85%	85%	85%	90%	90%	100%
13	85%	85%	85%	90%	90%	100%
14	90%	90%	85%	90%	95%	100%
15	95%	95%	90%	95%	100%	100%
16	95%	95%	90%	95%	100%	100%
17	95%	95%	95%	95%	100%	100%
18	95%	95%	100%	100%	100%	100%
19	95%	95%	100%	100%	100%	100%
20+	100%	100%	100%	100%	100%	100%

Exhibit 6
RiverSource Life Insurance Company
Prior 2007 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Lapse Assumptions							
Lifetime Benefit				Non-Lifetime Benefit			
Duration	Issue Age Band			Duration	Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.5%	5.2%	5.0%	1	6.0%	5.4%	5.2%
2	6.5%	4.2%	2.8%	2	5.6%	4.1%	3.9%
3	4.9%	2.1%	3.5%	3	4.3%	3.0%	2.6%
4	2.9%	2.1%	1.3%	4	2.8%	1.8%	2.0%
5	2.6%	1.2%	1.2%	5	2.2%	2.6%	2.8%
6	1.8%	1.3%	1.0%	6	1.7%	1.3%	1.8%
7	1.9%	1.0%	1.0%	7	1.0%	1.0%	1.3%
8	1.0%	1.0%	1.0%	8	1.0%	1.3%	1.5%
9	0.9%	1.1%	1.3%	9	1.2%	1.3%	3.0%
10	0.9%	1.0%	1.3%	10	1.2%	1.3%	3.5%
11	0.9%	0.9%	1.3%	11	1.2%	1.3%	4.0%
12	0.9%	0.9%	1.3%	12	1.2%	1.3%	4.2%
13	0.9%	0.9%	1.3%	13	1.2%	1.3%	4.3%
14	0.9%	0.9%	1.3%	14	1.2%	1.3%	4.4%
15	0.9%	0.9%	1.3%	15	1.2%	1.6%	4.5%
16	0.9%	1.0%	1.3%	16	1.2%	1.8%	4.5%
17	0.9%	1.1%	1.3%	17	1.2%	2.0%	4.5%
18	0.9%	1.1%	1.3%	18	1.2%	2.6%	4.5%
19	0.9%	1.1%	1.3%	19	1.2%	2.8%	4.5%
20	0.9%	1.1%	1.3%	20	1.2%	3.0%	4.5%
21	0.9%	1.1%	1.3%	21	1.2%	3.5%	4.5%
22	0.9%	1.1%	1.3%	22	1.2%	3.7%	4.5%
23	0.9%	1.1%	1.3%	23	1.2%	3.8%	4.5%
24	0.9%	1.1%	1.3%	24	1.2%	3.9%	4.5%
25	0.9%	1.1%	1.3%	25	1.4%	4.0%	4.5%
26	0.9%	1.1%	1.3%	26	1.5%	4.0%	4.5%
27	1.0%	1.1%	1.3%	27	1.6%	4.0%	4.5%
28	1.0%	1.1%	1.3%	28	2.1%	4.0%	4.5%
29	1.0%	1.1%	1.3%	29	2.4%	4.0%	4.5%
30	1.0%	1.1%	1.3%	30	2.6%	4.0%	4.5%
31	1.0%	1.1%	1.3%	31	2.9%	4.0%	4.5%
32	1.0%	1.1%	1.3%	32	3.1%	4.0%	4.5%
33	1.0%	1.1%	1.3%	33	3.2%	4.0%	4.5%
34	1.0%	1.1%	1.3%	34	3.3%	4.0%	4.5%
35	1.0%	1.1%	1.3%	35	3.4%	4.0%	4.5%
36	1.0%	1.1%	1.3%	36	3.5%	4.0%	4.5%
37+	1.0%	1.1%	1.3%	37+	3.5%	4.0%	4.5%

Interest Rate Assumptions	
Current Assumption:	4.50%

Exhibit 7
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions								
Currently assumed claim costs are the product of original pricing expected claim costs and actual-to-expected morbidity adjustment factor. The company took steps beginning in 2003 to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible, which is reflected in a 5% reduction in expected claim costs for 2004 and later. The morbidity actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2009.								
Lifetime Benefit Actual-to-Expected Adjustment Factors								
Duration	Issue Age Group							
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78+
1	0.10	0.10	0.20	0.20	0.30	0.30	1.05	1.45
2	0.08	0.10	0.25	0.25	0.30	0.30	1.05	1.45
3	0.07	0.10	0.30	0.30	0.30	0.30	1.05	1.45
4	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
5	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
6	0.06	0.10	0.30	0.30	0.95	1.00	1.05	1.60
7	0.07	0.10	0.30	0.30	0.95	1.00	1.05	1.60
8	0.07	0.25	0.35	0.40	0.95	1.05	1.20	1.60
9	0.07	0.30	0.35	0.40	0.95	1.05	1.25	1.60
10	0.07	0.30	0.35	0.50	0.95	1.15	1.25	1.60
11	0.07	0.30	0.35	0.55	0.95	1.15	1.25	1.60
12	0.07	0.30	0.40	0.60	0.95	1.15	1.25	1.60
13	0.20	0.35	0.40	0.65	0.95	1.15	1.25	1.60
14	0.27	0.35	0.40	0.70	0.95	1.15	1.25	1.60
15	0.30	0.35	0.50	0.75	0.95	1.15	1.25	1.60
16	0.30	0.35	0.55	0.80	0.95	1.15	1.25	1.60
17	0.30	0.40	0.60	0.85	0.95	1.15	1.25	1.60
18	0.35	0.40	0.65	0.85	0.95	1.15	1.25	1.60
19	0.35	0.40	0.70	0.85	0.95	1.15	1.25	1.60
20	0.35	0.50	0.75	0.85	0.95	1.15	1.25	1.60
21	0.35	0.55	0.80	0.90	1.00	1.15	1.30	1.60
22	0.40	0.60	0.85	0.90	1.00	1.15	1.30	1.60
23	0.40	0.65	0.85	0.90	1.00	1.15	1.30	1.60
24	0.40	0.70	0.85	0.95	1.00	1.15	1.30	1.60
25	0.50	0.75	0.85	0.95	1.00	1.15	1.30	1.60
26	0.55	0.80	0.85	1.00	1.00	1.15	1.30	1.60
27	0.60	0.85	0.85	1.00	1.00	1.15	1.30	1.60
28	0.65	0.85	0.85	1.00	1.00	1.15	1.30	1.60
29	0.70	0.85	0.90	1.00	1.00	1.15	1.30	1.60
30	0.75	0.85	0.95	1.00	1.00	1.15	1.30	1.60
31	0.80	0.90	1.00	1.00	1.00	1.15	1.30	1.60
32	0.85	0.90	1.00	1.00	1.00	1.15	1.30	1.60
33	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
34	0.85	0.95	1.00	1.00	1.00	1.15	1.30	1.60
35	0.85	1.00	1.00	1.00	1.00	1.15	1.30	1.60
36	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
37	0.90	1.00	1.00	1.00	1.00	1.15	1.30	1.60
38	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
39	0.95	1.00	1.00	1.00	1.00	1.15	1.30	1.60
40+	1.00	1.00	1.00	1.00	1.00	1.15	1.30	1.60

Exhibit 7
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions									
Non-Lifetime Benefit Actual-to-Expected Adjustment Factors									
Duration	Issue Age Group								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.25	0.25	0.50	0.50	0.50	1.25
2	0.08	0.15	0.15	0.25	0.25	0.50	0.65	0.75	1.25
3	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	1.45
4	0.07	0.15	0.15	0.40	0.35	0.60	0.65	0.75	2.00
5	0.06	0.15	0.15	0.40	0.35	0.60	1.30	0.75	2.00
6	0.06	0.15	0.35	0.45	0.65	1.10	1.30	1.50	2.00
7	0.10	0.15	0.35	0.45	0.85	1.10	1.30	1.60	2.00
8	0.10	0.25	0.35	0.60	0.90	1.25	1.30	1.70	2.00
9	0.10	0.25	0.35	0.70	1.00	1.25	1.30	1.70	2.00
10	0.10	0.25	0.35	0.70	1.05	1.25	1.30	1.70	2.00
11	0.11	0.30	0.35	0.70	1.05	1.25	1.30	1.70	2.00
12	0.11	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
13	0.20	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
14	0.23	0.30	0.40	0.70	1.05	1.25	1.30	1.70	2.00
15	0.25	0.30	0.40	0.80	1.05	1.25	1.30	1.70	2.00
16	0.30	0.30	0.60	0.80	1.05	1.25	1.30	1.70	2.00
17	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
18	0.30	0.40	0.60	0.80	1.05	1.25	1.30	1.70	2.00
19	0.30	0.40	0.60	0.85	1.05	1.25	1.30	1.70	2.00
20	0.30	0.40	0.80	1.00	1.05	1.25	1.30	1.70	2.00
21	0.30	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
22	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
23	0.40	0.60	0.80	1.00	1.05	1.25	1.30	1.70	2.00
24	0.40	0.60	0.85	1.00	1.05	1.25	1.30	1.70	2.00
25	0.40	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
26	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
27	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
28	0.60	0.80	1.00	1.00	1.05	1.25	1.30	1.70	2.00
29	0.60	0.85	1.00	1.00	1.05	1.25	1.30	1.70	2.00
30	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
31	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
32	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
33	0.80	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
34	0.85	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00
35+	1.00	1.00	1.00	1.00	1.05	1.25	1.30	1.70	2.00

Exhibit 7
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Mortality Assumptions						
1983 Individual Annuity Mortality Basic Table with A/E adjustment factors consistent with experience						
Mortality Actual-to-Expected Adjustment Factors						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	45%	40%	35%
4	40%	50%	45%	45%	45%	35%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	55%	55%	60%	60%	65%	65%
8	55%	55%	60%	60%	70%	75%
9	55%	55%	70%	75%	75%	85%
10	55%	65%	70%	80%	75%	85%
11	65%	70%	70%	80%	75%	85%
12	65%	70%	70%	80%	85%	90%
13	65%	70%	75%	85%	95%	100%
14	65%	75%	75%	90%	95%	100%
15	70%	75%	75%	90%	95%	100%
16	70%	75%	85%	90%	95%	100%
17	70%	75%	85%	90%	100%	100%
18	75%	75%	85%	90%	100%	100%
19	85%	75%	85%	95%	100%	100%
20	85%	80%	90%	100%	100%	100%
21	85%	85%	90%	100%	100%	100%
22	85%	85%	90%	100%	100%	100%
23	85%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

Exhibit 7
RiverSource Life Insurance Company
Prior 2011 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Lapse Assumptions							
Lifetime Benefit				Non-Lifetime Benefit			
Duration	Issue Age Band			Duration	Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.8%	6.7%	6.8%	1	6.9%	7.1%	5.4%
2	6.4%	4.4%	3.4%	2	6.0%	4.9%	4.6%
3	4.7%	3.5%	3.4%	3	4.2%	3.4%	3.1%
4	3.6%	2.6%	1.9%	4	3.1%	2.9%	2.9%
5	2.6%	1.9%	1.3%	5	2.4%	2.0%	2.3%
6	1.6%	1.7%	1.3%	6	1.8%	1.8%	2.3%
7	1.4%	1.1%	1.3%	7	1.4%	1.6%	2.4%
8	1.0%	1.1%	1.3%	8	1.2%	1.3%	2.6%
9	1.0%	1.1%	1.3%	9	1.2%	1.3%	2.8%
10	0.8%	1.0%	1.3%	10	1.1%	1.3%	3.5%
11	0.7%	0.9%	1.4%	11	1.0%	1.4%	4.0%
12	0.7%	0.9%	1.5%	12	0.9%	1.4%	4.2%
13	0.7%	0.9%	1.5%	13	0.8%	1.4%	4.4%
14	0.7%	0.9%	1.6%	14	0.8%	1.5%	4.7%
15	0.7%	0.9%	1.6%	15	0.8%	1.6%	4.9%
16	0.7%	1.0%	1.7%	16	0.8%	1.8%	5.1%
17	0.7%	1.1%	1.8%	17	0.8%	2.0%	5.3%
18	0.7%	1.2%	1.8%	18	0.8%	2.2%	5.4%
19	0.7%	1.2%	1.8%	19	0.9%	2.4%	5.4%
20	0.8%	1.2%	1.8%	20	0.9%	2.6%	5.4%
21	0.8%	1.3%	1.8%	21	0.9%	2.8%	5.4%
22	0.8%	1.3%	1.8%	22	0.9%	3.0%	5.4%
23	0.8%	1.4%	1.8%	23	1.0%	3.2%	5.4%
24	0.9%	1.4%	1.8%	24	1.2%	3.4%	5.4%
25	0.9%	1.4%	1.8%	25	1.4%	3.6%	5.4%
26	0.9%	1.4%	1.8%	26	1.5%	3.8%	5.4%
27	1.0%	1.4%	1.8%	27	1.6%	4.0%	5.4%
28	1.0%	1.4%	1.8%	28	2.1%	4.0%	5.4%
29	1.0%	1.4%	1.8%	29	2.4%	4.0%	5.4%
30	1.0%	1.4%	1.8%	30	2.6%	4.0%	5.4%
31	1.1%	1.4%	1.8%	31	2.9%	4.0%	5.4%
32	1.1%	1.4%	1.8%	32	3.1%	4.0%	5.4%
33	1.1%	1.4%	1.8%	33	3.2%	4.0%	5.4%
34	1.1%	1.4%	1.8%	34	3.3%	4.0%	5.4%
35	1.1%	1.4%	1.8%	35	3.4%	4.0%	5.4%
36+	1.1%	1.4%	1.8%	36+	3.5%	4.0%	5.4%

Interest Rate Assumptions	
Current Assumption:	4.50%

Exhibit 8
RiverSource Life Insurance Company
Prior 2013 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions							
Currently assumed claim costs are the product of original pricing expected claim costs and actual-to-expected morbidity adjustment factor. The company took steps beginning in 2003 to improve claim experience by reviewing and tightening claim adjudication and care coordination practices where possible, which is reflected in a 5% reduction in expected claim costs for 2004 and later. The morbidity actual-to-expected adjustment factors were developed from actual emerging experience through anniversaries ending December 2011.							
Lifetime Benefit Actual-to-Expected Adjustment Factors							
Duration	Issue Age Band						
	<53	53–57	58–62	63–67	68–72	73–77	78+
1	0.10	0.35	0.35	0.40	0.45	1.20	1.70
2	0.10	0.35	0.35	0.45	0.50	1.25	1.70
3	0.10	0.35	0.35	0.45	0.60	1.25	1.70
4	0.10	0.35	0.35	0.95	0.80	1.30	1.70
5	0.10	0.35	0.35	0.95	0.90	1.30	1.70
6	0.10	0.35	0.35	0.95	1.00	1.35	1.70
7	0.15	0.35	0.40	0.95	1.15	1.40	1.70
8	0.15	0.35	0.50	0.90	1.15	1.35	1.70
9	0.15	0.35	0.60	0.95	1.15	1.45	1.70
10	0.15	0.35	0.60	0.95	1.15	1.50	1.70
11	0.15	0.35	0.65	0.95	1.15	1.50	1.70
12	0.25	0.40	0.65	0.95	1.15	1.50	1.70
13	0.30	0.45	0.70	1.00	1.15	1.50	1.70
14	0.30	0.50	0.75	1.00	1.15	1.50	1.70
15	0.30	0.50	0.75	1.00	1.15	1.50	1.70
16	0.30	0.55	0.75	1.00	1.15	1.50	1.70
17	0.35	0.60	0.80	1.05	1.15	1.50	1.70
18	0.35	0.65	0.80	1.05	1.15	1.50	1.70
19	0.35	0.70	0.80	1.05	1.15	1.60	1.70
20	0.45	0.75	0.85	1.05	1.15	1.60	1.70
21	0.50	0.80	0.85	1.05	1.15	1.60	1.80
22	0.55	0.85	0.85	1.05	1.15	1.70	1.80
23	0.60	0.85	0.90	1.05	1.15	1.70	1.80
24	0.65	0.85	0.90	1.05	1.15	1.70	1.90
25	0.70	0.85	0.90	1.05	1.15	2.00	1.90
26	0.75	0.85	0.95	1.05	1.15	2.00	1.90
27	0.80	0.85	0.95	1.05	1.15	2.10	2.00
28	0.80	0.85	1.00	1.05	1.15	2.10	2.00
29	0.90	0.90	1.00	1.05	1.15	2.10	2.00
30	0.90	0.95	1.05	1.05	1.15	2.10	2.00
31	0.90	0.98	1.08	1.05	1.15	2.10	2.03
32	0.94	0.98	1.08	1.05	1.15	2.10	2.03
33	0.94	0.98	1.08	1.05	1.15	2.10	2.03
34	1.00	0.98	1.08	1.05	1.15	2.10	2.03
35+	1.00	1.00	1.10	1.05	1.15	2.10	2.05

Exhibit 8
RiverSource Life Insurance Company
Prior 2013 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Morbidity Assumptions									
Non-Lifetime Benefit Actual-to-Expected Adjustment Factors									
Duration	Issue Age Group								
	<48	48-52	53-57	58-62	63-67	68-72	73-77	78-82	83+
1	0.10	0.10	0.10	0.20	0.20	0.45	0.65	0.70	1.50
2	0.10	0.10	0.10	0.25	0.30	0.45	0.85	0.90	1.60
3	0.15	0.15	0.15	0.30	0.35	0.55	1.05	0.90	1.70
4	0.20	0.20	0.20	0.40	0.35	0.80	1.15	1.10	2.15
5	0.25	0.25	0.25	0.45	0.45	0.80	1.40	1.40	2.15
6	0.30	0.30	0.35	0.50	0.60	1.00	1.40	1.85	2.15
7	0.30	0.30	0.40	0.55	0.75	1.05	1.45	2.05	2.15
8	0.30	0.30	0.45	0.60	0.85	1.15	1.55	2.30	2.15
9	0.35	0.35	0.55	0.75	0.95	1.20	1.70	2.60	2.20
10	0.40	0.40	0.55	0.80	1.00	1.25	1.70	2.60	2.20
11	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
12	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
13	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
14	0.40	0.40	0.55	0.90	1.05	1.25	1.75	2.65	2.20
15	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
16	0.45	0.45	0.55	0.95	1.05	1.25	1.75	2.65	2.20
17	0.50	0.50	0.60	0.95	1.05	1.25	1.75	2.65	2.20
18	0.50	0.50	0.65	0.95	1.05	1.25	1.75	2.65	2.20
19	0.55	0.55	0.70	0.95	1.05	1.25	1.80	2.65	2.20
20	0.55	0.55	0.80	0.95	1.05	1.25	1.80	2.65	2.20
21	0.60	0.60	0.80	0.95	1.05	1.25	1.80	2.70	2.20
22	0.60	0.60	0.85	0.95	1.05	1.25	1.80	2.70	2.20
23	0.65	0.65	0.85	1.00	1.05	1.25	1.80	2.70	2.20
24	0.65	0.65	0.90	1.00	1.05	1.25	1.90	2.70	2.20
25	0.70	0.70	0.90	1.00	1.05	1.25	1.90	2.70	2.20
26	0.75	0.75	0.95	1.00	1.05	1.25	1.90	2.70	2.20
27	0.80	0.80	0.95	1.00	1.05	1.25	1.90	2.70	2.20
28	0.85	0.85	1.00	1.00	1.05	1.25	1.90	2.70	2.20
29	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
30	0.90	0.90	1.00	1.05	1.05	1.25	2.00	2.70	2.20
31	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
32	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
33	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
34	0.95	0.95	1.00	1.05	1.08	1.25	2.00	2.70	2.20
35+	1.00	1.00	1.00	1.05	1.10	1.25	2.00	2.70	2.20

Exhibit 8
RiverSource Life Insurance Company
Prior 2013 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Mortality Assumptions						
1983 Individual Annuity Mortality Basic Table with A/E adjustment factors consistent with experience						
Mortality Actual-to-Expected Adjustment Factors						
Duration	Issue Age Band					
	<58	58-62	63-67	68-72	73-77	78+
1	20%	20%	25%	20%	20%	25%
2	25%	35%	40%	30%	25%	25%
3	35%	45%	45%	40%	40%	40%
4	40%	50%	45%	45%	45%	45%
5	45%	50%	45%	55%	50%	55%
6	50%	50%	55%	55%	60%	60%
7	50%	55%	60%	60%	65%	65%
8	50%	55%	60%	60%	70%	75%
9	50%	55%	65%	70%	75%	85%
10	60%	65%	70%	75%	75%	85%
11	60%	70%	70%	80%	75%	85%
12	60%	70%	70%	80%	90%	90%
13	60%	70%	75%	85%	90%	95%
14	60%	75%	75%	90%	90%	95%
15	60%	75%	80%	90%	95%	95%
16	75%	75%	80%	90%	95%	100%
17	75%	75%	80%	95%	100%	100%
18	75%	75%	80%	95%	100%	100%
19	75%	80%	80%	95%	100%	100%
20	75%	80%	90%	95%	100%	100%
21	75%	80%	90%	100%	100%	100%
22	80%	85%	90%	100%	100%	100%
23	80%	85%	95%	100%	100%	100%
24	85%	90%	95%	100%	100%	100%
25	90%	90%	100%	100%	100%	100%
26	90%	90%	100%	100%	100%	100%
27	90%	90%	100%	100%	100%	100%
28	90%	95%	100%	100%	100%	100%
29	90%	95%	100%	100%	100%	100%
30	90%	100%	100%	100%	100%	100%
31	90%	100%	100%	100%	100%	100%
32	95%	100%	100%	100%	100%	100%
33	95%	100%	100%	100%	100%	100%
34	95%	100%	100%	100%	100%	100%
35+	100%	100%	100%	100%	100%	100%

Exhibit 8
RiverSource Life Insurance Company
Prior 2013 Rate Increase Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

Lapse Assumptions							
Lifetime Benefit				Non-Lifetime Benefit			
Duration	Issue Age Band			Duration	Issue Age Band		
	<63	63-72	73+		<63	63-72	73+
1	6.9%	6.8%	7.0%	1	6.9%	7.1%	5.3%
2	6.5%	4.5%	3.5%	2	6.0%	4.8%	4.6%
3	4.8%	3.5%	3.5%	3	4.2%	3.3%	3.1%
4	3.6%	2.6%	1.9%	4	3.1%	2.9%	2.9%
5	2.6%	1.9%	1.3%	5	2.3%	2.0%	2.2%
6	1.9%	1.6%	1.3%	6	1.7%	1.9%	2.1%
7	1.5%	1.1%	1.3%	7	1.5%	1.6%	2.3%
8	1.1%	1.1%	1.3%	8	1.2%	1.4%	2.5%
9	1.1%	1.1%	1.3%	9	1.2%	1.3%	2.7%
10	0.8%	1.1%	1.3%	10	1.0%	1.3%	3.4%
11	0.7%	0.9%	1.4%	11	1.0%	1.5%	3.9%
12	0.7%	0.9%	1.5%	12	0.9%	1.5%	4.0%
13	0.7%	0.9%	1.5%	13	0.8%	1.5%	4.4%
14	0.7%	0.9%	1.6%	14	0.8%	1.5%	4.8%
15	0.7%	0.9%	1.6%	15	0.7%	1.6%	4.9%
16	0.7%	1.0%	1.7%	16	0.7%	1.8%	5.4%
17	0.7%	1.1%	1.7%	17	0.8%	2.0%	5.4%
18	0.7%	1.2%	1.8%	18	0.8%	2.2%	5.4%
19	0.7%	1.2%	1.8%	19	0.9%	2.4%	5.4%
20	0.8%	1.2%	1.9%	20	0.9%	2.6%	5.4%
21	0.8%	1.3%	1.9%	21	0.9%	2.8%	5.4%
22	0.8%	1.3%	2.0%	22	0.9%	3.0%	5.4%
23	0.8%	1.4%	2.0%	23	1.0%	3.2%	5.4%
24	0.9%	1.4%	2.0%	24	1.2%	3.4%	5.4%
25	0.9%	1.4%	2.0%	25	1.4%	3.6%	5.4%
26	0.9%	1.4%	2.0%	26	1.5%	3.8%	5.4%
27	1.0%	1.4%	2.0%	27	1.6%	4.0%	5.4%
28	1.0%	1.4%	2.0%	28	2.1%	4.0%	5.4%
29	1.0%	1.4%	2.0%	29	2.4%	4.0%	5.4%
30	1.0%	1.4%	2.0%	30	2.6%	4.0%	5.4%
31	1.1%	1.4%	2.0%	31	2.9%	4.0%	5.4%
32	1.1%	1.4%	2.0%	32	3.1%	4.0%	5.4%
33	1.1%	1.4%	2.0%	33	3.2%	4.0%	5.4%
34	1.1%	1.4%	2.0%	34	3.3%	4.0%	5.4%
35	1.1%	1.4%	2.0%	35	3.4%	4.0%	5.4%
36+	1.1%	1.4%	2.0%	36+	3.5%	4.0%	5.4%

Interest Rate Assumptions	
Current Assumption:	4.50%

Exhibit 9
RiverSource Life Insurance Company
Nationwide Experience
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis
Before Premium Rate Increase
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Ending Policies Inforce	Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio			
Historical Experience	2000	3,315,109	0	0.0%	7,321,347	0	0.0%	9,836	4.50%	2.2085
	2001	26,852,721	521,781	1.9%	56,749,919	1,102,720	1.9%	25,543	4.50%	2.1134
	2002	48,214,639	2,040,754	4.2%	97,507,846	4,127,160	4.2%	39,113	4.50%	2.0224
	2003	58,070,154	1,472,260	2.5%	112,382,149	2,849,239	2.5%	37,806	4.50%	1.9353
	2004	55,090,562	4,398,931	8.0%	102,024,686	8,146,578	8.0%	36,450	4.50%	1.8519
	2005	53,268,754	7,196,848	13.5%	94,402,677	12,754,225	13.5%	35,452	4.50%	1.7722
	2006	51,919,262	6,355,511	12.2%	88,048,912	10,778,193	12.2%	34,703	4.50%	1.6959
	2007	50,887,586	13,593,018	26.7%	82,583,075	22,059,470	26.7%	34,072	4.50%	1.6229
	2008	51,986,263	9,365,215	18.0%	80,733,076	14,543,892	18.0%	33,149	4.50%	1.5530
	2009	51,336,473	18,401,932	35.8%	76,290,884	27,347,022	35.8%	32,432	4.50%	1.4861
	2010	50,101,940	18,094,255	36.1%	71,249,999	25,731,852	36.1%	31,770	4.50%	1.4221
	2011	48,882,784	25,185,480	51.5%	66,522,714	34,273,959	51.5%	31,155	4.50%	1.3609
	2012	49,181,850	27,554,995	56.0%	64,047,563	35,883,771	56.0%	30,486	4.50%	1.3023
	2013	50,935,676	26,676,965	52.4%	63,475,119	33,244,352	52.4%	29,850	4.50%	1.2462
	2014	49,602,165	28,164,229	56.8%	59,151,504	33,586,367	56.8%	29,188	4.50%	1.1925
	2015	49,085,442	45,884,468	93.5%	56,014,644	52,361,800	93.5%	28,567	4.50%	1.1412
	2016	51,249,717	48,083,527	93.8%	55,965,972	52,508,414	93.8%	27,865	4.50%	1.0920
	2017	49,881,151	50,194,526	100.6%	52,125,802	52,453,280	100.6%	27,157	4.50%	1.0450
	1/1/2018-6/30/2018	24,154,154	32,925,206	136.3%	24,421,420	33,289,523	136.3%	26,844	4.50%	1.0111
Projected Future Experience	7/1/2018-12/31/2018	23,937,464	28,019,256	117.1%	23,675,495	27,712,616	117.1%	26,328	4.50%	0.9891
	2019	46,435,596	59,737,303	128.6%	44,435,977	57,164,884	128.6%	25,440	4.50%	0.9569
	2020	44,472,421	64,861,772	145.8%	40,724,728	59,395,868	145.8%	24,517	4.50%	0.9157
	2021	42,465,901	70,206,632	165.3%	37,212,725	61,521,833	165.3%	23,551	4.50%	0.8763
	2022	40,394,770	75,531,379	187.0%	33,873,493	63,337,695	187.0%	22,531	4.50%	0.8386
	2023	38,260,826	80,797,296	211.2%	30,702,440	64,835,875	211.2%	21,465	4.50%	0.8025
	2024	36,084,271	85,948,606	238.2%	27,708,958	65,999,568	238.2%	20,359	4.50%	0.7679
	2025	33,882,303	91,000,134	268.6%	24,897,681	66,869,488	268.6%	19,216	4.50%	0.7348
	2026	31,655,542	95,823,875	302.7%	22,259,706	67,381,924	302.7%	18,039	4.50%	0.7032
	2027	29,413,202	100,294,222	341.0%	19,792,274	67,488,426	341.0%	16,837	4.50%	0.6729
	2028	27,163,938	104,211,634	383.6%	17,491,612	67,104,756	383.6%	15,611	4.50%	0.6439
	2029	24,924,226	107,228,176	430.2%	15,358,276	66,073,867	430.2%	14,375	4.50%	0.6162
	2030	22,718,099	109,248,260	480.9%	13,396,042	64,419,751	480.9%	13,145	4.50%	0.5897
	2031	20,575,035	110,328,755	536.2%	11,609,909	62,255,388	536.2%	11,941	4.50%	0.5643
	2032	18,508,225	110,514,975	597.1%	9,993,939	59,675,088	597.1%	10,767	4.50%	0.5400
	2033	16,530,751	109,795,906	664.2%	8,541,777	56,733,789	664.2%	9,637	4.50%	0.5167
	2034	14,660,272	108,287,155	738.6%	7,249,055	53,544,676	738.6%	8,564	4.50%	0.4945
	2035	12,908,494	105,946,825	820.8%	6,107,995	50,131,536	820.8%	7,551	4.50%	0.4732
	2036	11,276,449	102,733,557	911.0%	5,105,980	46,517,793	911.0%	6,602	4.50%	0.4528
	2037	9,769,525	98,687,096	1010.2%	4,233,152	42,761,295	1010.2%	5,725	4.50%	0.4333
	2038	8,400,194	93,988,811	1118.9%	3,483,080	38,971,790	1118.9%	4,928	4.50%	0.4146
	2039	7,169,971	88,786,987	1238.3%	2,844,954	35,229,560	1238.3%	4,210	4.50%	0.3968
	2040	6,074,015	83,082,775	1367.8%	2,306,309	31,546,603	1367.8%	3,569	4.50%	0.3797
	2041	5,105,689	76,748,885	1503.2%	1,855,153	27,886,717	1503.2%	3,001	4.50%	0.3634
	2042	4,257,440	69,933,732	1642.6%	1,480,327	24,316,201	1642.6%	2,503	4.50%	0.3477
	2043	3,520,949	62,935,160	1787.4%	1,171,528	20,940,453	1787.4%	2,070	4.50%	0.3327
	2044	2,887,321	56,076,348	1942.2%	919,330	17,854,849	1942.2%	1,696	4.50%	0.3184
	2045	2,347,277	49,459,006	2107.1%	715,195	15,069,732	2107.1%	1,378	4.50%	0.3047
	2046	1,891,363	43,181,547	2283.1%	551,466	12,590,473	2283.1%	1,109	4.50%	0.2916
	2047	1,510,169	37,312,935	2470.8%	421,360	10,410,869	2470.8%	884	4.50%	0.2790
	2048	1,194,545	31,900,846	2670.5%	318,944	8,517,526	2670.5%	698	4.50%	0.2670
	2049	935,785	26,978,096	2882.9%	239,095	6,892,969	2882.9%	545	4.50%	0.2555
	2050	725,769	22,555,524	3107.8%	177,450	5,514,824	3107.8%	421	4.50%	0.2445
	2051	557,059	18,634,722	3345.2%	130,336	4,359,988	3345.2%	322	4.50%	0.2340
	2052	422,961	15,207,629	3595.5%	94,699	3,404,926	3595.5%	244	4.50%	0.2239
	2053	317,537	12,251,109	3858.2%	68,034	2,624,855	3858.2%	182	4.50%	0.2143
	2054	235,597	9,739,584	4134.0%	48,304	1,996,889	4134.0%	134	4.50%	0.2050
	2055	172,664	7,637,158	4423.1%	33,877	1,498,404	4423.1%	98	4.50%	0.1962
	2056	124,924	5,904,010	4726.1%	23,455	1,108,480	4726.1%	70	4.50%	0.1878
	2057	89,172	4,497,201	5043.3%	16,021	807,992	5043.3%	50	4.50%	0.1797
	2058	62,754	3,372,948	5374.9%	10,789	579,907	5374.9%	35	4.50%	0.1719
	2059	43,500	2,487,442	5718.3%	7,157	409,247	5718.3%	24	4.50%	0.1645
	2060	29,667	1,801,213	6071.4%	4,671	283,583	6071.4%	16	4.50%	0.1574
	2061	19,877	1,277,618	6427.6%	2,995	192,487	6427.6%	11	4.50%	0.1507
	2062	13,058	885,577	6782.0%	1,883	127,676	6782.0%	7	4.50%	0.1442
	2063	8,390	598,457	7133.0%	1,158	82,566	7133.0%	4	4.50%	0.1380
	2064	5,257	393,205	7480.1%	694	51,912	7480.1%	3	4.50%	0.1320
	2065	3,200	250,617	7832.7%	404	31,662	7832.7%	2	4.50%	0.1263
	2066	1,883	154,235	8188.9%	228	18,647	8188.9%	1	4.50%	0.1209
	2067	1,066	91,132	8546.7%	123	10,543	8546.7%	1	4.50%	0.1157
	2068	334	29,515	8835.2%	37	3,268	8835.2%	0	4.50%	0.1107
Past Future Lifetime	Past	874,016,400	366,109,899	41.9%	1,311,019,308	457,041,815	34.9%			
	Future	594,166,696	2,647,356,838	445.6%	421,300,267	1,444,261,711	342.8%			
	Lifetime	1,468,183,097	3,013,466,738	205.3%	1,732,319,575	1,901,303,526	109.8%			

Exhibit 9
RiverSource Life Insurance Company
Nationwide Experience
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis
With Requested Premium Rate Increase, Spread Over Three Years
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Ending Policies Inforce	Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio			
Historical Experience	2000	3,315,109	0	0.0%	7,321,347	0	0.0%	9,836	4.50%	2.2085
	2001	26,852,721	521,781	1.9%	56,749,919	1,102,720	1.9%	25,543	4.50%	2.1134
	2002	48,214,639	2,040,754	4.2%	97,507,846	4,127,160	4.2%	39,113	4.50%	2.0224
	2003	58,070,154	1,472,260	2.5%	112,382,149	2,849,239	2.5%	37,806	4.50%	1.9353
	2004	55,090,562	4,398,931	8.0%	102,024,686	8,146,578	8.0%	36,450	4.50%	1.8519
	2005	53,268,754	7,196,848	13.5%	94,402,677	12,754,225	13.5%	35,452	4.50%	1.7722
	2006	51,919,262	6,355,511	12.2%	88,048,912	10,778,193	12.2%	34,703	4.50%	1.6959
	2007	50,887,586	13,593,018	26.7%	82,583,075	22,059,470	26.7%	34,072	4.50%	1.6229
	2008	51,986,263	9,365,215	18.0%	80,733,076	14,543,892	18.0%	33,149	4.50%	1.5530
	2009	51,336,473	18,401,932	35.8%	76,290,884	27,347,022	35.8%	32,432	4.50%	1.4861
	2010	50,101,940	18,094,255	36.1%	71,249,999	25,731,852	36.1%	31,770	4.50%	1.4221
	2011	48,882,784	25,185,480	51.5%	66,522,714	34,273,959	51.5%	31,155	4.50%	1.3609
	2012	49,181,850	27,554,995	56.0%	64,047,563	35,883,771	56.0%	30,486	4.50%	1.3023
	2013	50,935,676	26,676,965	52.4%	63,475,119	33,244,352	52.4%	29,850	4.50%	1.2462
	2014	49,602,165	28,164,229	56.8%	59,151,504	33,586,367	56.8%	29,188	4.50%	1.1925
	2015	49,085,442	45,884,468	93.5%	56,014,644	52,361,800	93.5%	28,567	4.50%	1.1412
	2016	51,249,717	48,083,527	93.8%	55,965,972	52,508,414	93.8%	27,865	4.50%	1.0920
	2017	49,881,151	50,194,526	100.6%	52,125,802	52,453,280	100.6%	27,157	4.50%	1.0450
	1/1/2018-6/30/2018	24,154,154	32,925,206	136.3%	24,421,420	33,289,523	136.3%	26,844	4.50%	1.0111
Projected Future Experience	7/1/2018-12/31/2018	23,937,464	28,019,256	117.1%	23,675,495	27,712,616	117.1%	26,328	4.50%	0.9891
	2019	51,181,391	59,719,406	116.7%	48,977,407	57,147,757	116.7%	25,108	4.50%	0.9569
	2020	59,880,901	65,358,014	109.1%	54,834,734	59,850,291	109.1%	24,148	4.50%	0.9157
	2021	57,427,580	70,102,350	122.1%	50,323,593	61,430,451	122.1%	23,196	4.50%	0.8763
	2022	54,626,939	74,628,748	136.6%	45,808,040	62,580,784	136.6%	22,192	4.50%	0.8386
	2023	51,741,323	78,991,910	152.7%	41,519,879	63,387,141	152.7%	21,142	4.50%	0.8025
	2024	48,798,055	83,300,159	170.7%	37,471,818	63,965,837	170.7%	20,052	4.50%	0.7679
	2025	45,820,401	87,983,595	192.0%	33,670,134	64,652,849	192.0%	18,927	4.50%	0.7348
	2026	42,809,193	92,587,355	216.3%	30,102,788	65,106,051	216.3%	17,768	4.50%	0.7032
	2027	39,776,894	96,854,392	243.5%	26,766,048	65,173,749	243.5%	16,583	4.50%	0.6729
	2028	36,735,203	100,587,167	273.8%	23,654,814	64,770,861	273.8%	15,376	4.50%	0.6439
	2029	33,706,397	103,451,523	306.9%	20,769,840	63,746,698	306.9%	14,159	4.50%	0.6162
	2030	30,722,986	105,356,327	342.9%	18,116,235	62,124,819	342.9%	12,948	4.50%	0.5897
	2031	27,824,839	106,357,173	382.2%	15,700,767	60,014,337	382.2%	11,761	4.50%	0.5643
	2032	25,029,806	106,498,420	425.5%	13,515,416	57,506,257	425.5%	10,605	4.50%	0.5400
	2033	22,355,576	105,770,206	473.1%	11,551,583	54,653,628	473.1%	9,492	4.50%	0.5167
	2034	19,826,030	104,284,310	526.0%	9,803,364	51,565,392	526.0%	8,435	4.50%	0.4945
	2035	17,457,006	102,000,910	584.3%	8,260,243	48,264,422	584.3%	7,437	4.50%	0.4732
	2036	15,249,896	98,880,627	648.4%	6,905,159	44,773,184	648.4%	6,503	4.50%	0.4528
	2037	13,211,989	94,962,013	718.8%	5,724,778	41,147,210	718.8%	5,639	4.50%	0.4333
	2038	11,360,152	90,419,801	795.9%	4,710,406	37,491,925	795.9%	4,854	4.50%	0.4146
	2039	9,696,440	85,396,673	880.7%	3,847,425	33,884,326	880.7%	4,147	4.50%	0.3968
	2040	8,214,305	79,893,818	972.6%	3,118,979	30,335,753	972.6%	3,516	4.50%	0.3797
	2041	6,904,772	73,788,911	1068.7%	2,508,850	26,811,210	1068.7%	2,956	4.50%	0.3634
	2042	5,757,626	67,224,590	1167.6%	2,001,946	23,374,224	1167.6%	2,465	4.50%	0.3477
	2043	4,761,619	60,487,006	1270.3%	1,584,336	20,125,877	1270.3%	2,038	4.50%	0.3327
	2044	3,904,719	53,886,506	1380.0%	1,243,272	17,157,597	1380.0%	1,671	4.50%	0.3184
	2045	3,174,381	47,520,539	1497.0%	967,207	14,479,098	1497.0%	1,357	4.50%	0.3047
	2046	2,557,818	41,483,339	1621.8%	745,785	12,095,326	1621.8%	1,092	4.50%	0.2916
	2047	2,042,303	35,840,836	1754.9%	569,833	10,000,131	1754.9%	871	4.50%	0.2790
	2048	1,615,463	30,638,509	1896.6%	431,329	8,180,482	1896.6%	687	4.50%	0.2670
	2049	1,265,524	25,907,566	2047.2%	323,344	6,619,446	2047.2%	537	4.50%	0.2555
	2050	981,505	21,658,144	2206.6%	239,978	5,295,414	2206.6%	415	4.50%	0.2445
	2051	753,348	17,891,515	2374.9%	176,262	4,186,099	2374.9%	317	4.50%	0.2340
	2052	571,997	14,599,715	2552.4%	128,068	3,268,816	2552.4%	240	4.50%	0.2239
	2053	429,426	11,760,330	2738.6%	92,006	2,519,703	2738.6%	179	4.50%	0.2143
	2054	318,613	9,348,633	2934.2%	65,325	1,916,733	2934.2%	132	4.50%	0.2050
	2055	233,505	7,330,022	3139.1%	45,813	1,438,144	3139.1%	96	4.50%	0.1962
	2056	168,943	5,666,155	3353.9%	31,719	1,063,823	3353.9%	69	4.50%	0.1878
	2057	120,593	4,315,723	3578.7%	21,666	775,386	3578.7%	49	4.50%	0.1797
	2058	84,866	3,236,627	3813.8%	14,591	556,469	3813.8%	34	4.50%	0.1719
	2059	58,827	2,386,763	4057.2%	9,679	392,682	4057.2%	23	4.50%	0.1645
	2060	40,121	1,728,211	4307.5%	6,317	272,090	4307.5%	16	4.50%	0.1574
	2061	26,881	1,225,772	4560.0%	4,050	184,675	4560.0%	10	4.50%	0.1507
	2062	17,659	849,597	4811.2%	2,546	122,489	4811.2%	7	4.50%	0.1442
	2063	11,346	574,116	5059.9%	1,565	79,208	5059.9%	4	4.50%	0.1380
	2064	7,109	377,196	5305.9%	939	49,799	5305.9%	3	4.50%	0.1320
	2065	4,327	240,404	5555.8%	547	30,372	5555.8%	2	4.50%	0.1263
	2066	2,547	147,944	5808.3%	308	17,886	5808.3%	1	4.50%	0.1209
	2067	1,442	87,411	6061.8%	167	10,113	6061.8%	0	4.50%	0.1157
	2068	452	28,309	6266.3%	50	3,134	6266.3%	0	4.50%	0.1107
	Past	874,016,400	366,109,899	41.9%	1,311,019,308	457,041,815	34.9%			
	Future	783,208,493	2,561,634,542	327.1%	550,046,441	1,402,312,766	254.9%			
	Lifetime	1,657,224,894	2,927,744,441	176.7%	1,861,065,749	1,859,354,581	99.9%			

Exhibit 10
RiverSource Life Insurance Company
Virginia Experience
Before Premium Rate Increase
Policy Form 30160A-VA, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Ending Policies Inforce	Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio			
Historical Experience	2000	155,749	0	0.0%	343,969	0	0.0%	510	4.50%	2.2085
	2001	1,237,018	0	0.0%	2,614,285	0	0.0%	1,213	4.50%	2.1134
	2002	2,248,430	193,326	8.6%	4,547,158	390,976	8.6%	1,908	4.50%	2.0224
	2003	2,804,625	0	0.0%	5,427,742	0	0.0%	1,881	4.50%	1.9353
	2004	2,693,301	334,456	12.4%	4,987,844	619,394	12.4%	1,839	4.50%	1.8519
	2005	2,640,412	791,847	30.0%	4,679,328	1,403,308	30.0%	1,810	4.50%	1.7722
	2006	2,599,342	18,125	0.7%	4,408,175	30,738	0.7%	1,793	4.50%	1.6959
	2007	2,581,592	520,898	20.2%	4,189,544	845,341	20.2%	1,762	4.50%	1.6229
	2008	2,671,579	577,532	21.6%	4,148,880	896,890	21.6%	1,731	4.50%	1.5530
	2009	2,670,237	605,672	22.7%	3,968,227	900,086	22.7%	1,709	4.50%	1.4861
	2010	2,628,436	21,117	0.8%	3,737,900	30,031	0.8%	1,690	4.50%	1.4221
	2011	2,593,661	394,571	15.2%	3,529,615	536,957	15.2%	1,671	4.50%	1.3609
	2012	2,635,478	1,038,907	39.4%	3,432,078	1,352,927	39.4%	1,654	4.50%	1.3023
	2013	2,739,922	887,558	32.4%	3,414,441	1,106,059	32.4%	1,622	4.50%	1.2462
	2014	2,682,062	521,053	19.4%	3,198,409	621,366	19.4%	1,597	4.50%	1.1925
	2015	2,672,597	1,330,631	49.8%	3,049,878	1,518,471	49.8%	1,560	4.50%	1.1412
	2016	2,805,362	1,628,017	58.0%	3,063,526	1,777,835	58.0%	1,532	4.50%	1.0920
	2017	2,772,800	1,660,730	59.9%	2,897,576	1,735,462	59.9%	1,511	4.50%	1.0450
	1/1/2018-6/30/2018	1,360,920	1,220,777	89.7%	1,375,978	1,234,285	89.7%	1,501	4.50%	1.0111
Projected Future Experience	7/1/2018-12/31/2018	1,354,811	1,385,657	102.3%	1,339,984	1,370,493	102.3%	1,479	4.50%	0.9891
	2019	2,641,480	2,998,084	113.5%	2,527,732	2,868,980	113.5%	1,435	4.50%	0.9569
	2020	2,547,492	3,316,590	130.2%	2,332,815	3,037,100	130.2%	1,389	4.50%	0.9157
	2021	2,449,749	3,658,343	149.3%	2,146,707	3,205,794	149.3%	1,340	4.50%	0.8763
	2022	2,346,976	4,006,326	170.7%	1,968,083	3,359,551	170.7%	1,287	4.50%	0.8386
	2023	2,238,910	4,357,204	194.6%	1,796,616	3,496,443	194.6%	1,232	4.50%	0.8025
	2024	2,126,138	4,713,990	221.7%	1,632,652	3,619,853	221.7%	1,173	4.50%	0.7679
	2025	2,009,444	5,070,552	252.3%	1,476,597	3,725,986	252.3%	1,112	4.50%	0.7348
	2026	1,889,015	5,418,220	286.8%	1,328,327	3,810,012	286.8%	1,048	4.50%	0.7032
	2027	1,765,677	5,746,904	325.5%	1,188,132	3,867,117	325.5%	982	4.50%	0.6729
	2028	1,639,811	6,049,651	368.9%	1,055,920	3,895,538	368.9%	914	4.50%	0.6439
	2029	1,512,411	6,299,599	416.5%	931,946	3,881,805	416.5%	845	4.50%	0.6162
	2030	1,385,218	6,488,114	468.4%	816,813	3,825,807	468.4%	776	4.50%	0.5897
	2031	1,260,236	6,622,801	525.5%	711,116	3,737,059	525.5%	707	4.50%	0.5643
	2032	1,138,341	6,694,997	588.1%	614,673	3,615,117	588.1%	639	4.50%	0.5400
	2033	1,020,544	6,704,159	656.9%	527,336	3,464,176	656.9%	574	4.50%	0.5167
	2034	908,111	6,663,646	733.8%	449,033	3,294,968	733.8%	511	4.50%	0.4945
	2035	801,893	6,566,126	818.8%	379,437	3,106,936	818.8%	452	4.50%	0.4732
	2036	702,206	6,404,727	912.1%	317,959	2,900,063	912.1%	396	4.50%	0.4528
	2037	609,536	6,184,428	1014.6%	264,113	2,679,724	1014.6%	344	4.50%	0.4333
	2038	524,837	5,916,124	1127.2%	217,620	2,453,078	1127.2%	296	4.50%	0.4146
	2039	448,343	5,608,137	1250.9%	177,897	2,225,238	1250.9%	253	4.50%	0.3968
	2040	379,873	5,260,404	1384.8%	144,238	1,997,380	1384.8%	215	4.50%	0.3797
	2041	319,129	4,864,051	1524.2%	115,956	1,767,353	1524.2%	180	4.50%	0.3634
	2042	265,738	4,429,483	1666.9%	92,398	1,540,147	1666.9%	150	4.50%	0.3477
	2043	219,263	3,976,926	1813.8%	72,955	1,323,245	1813.8%	124	4.50%	0.3327
	2044	179,216	3,530,630	1970.0%	57,063	1,124,161	1970.0%	101	4.50%	0.3184
	2045	145,066	3,097,426	2135.2%	44,200	943,759	2135.2%	82	4.50%	0.3047
	2046	116,256	2,684,389	2309.0%	33,897	782,689	2309.0%	65	4.50%	0.2916
	2047	92,217	2,297,421	2491.3%	25,730	641,015	2491.3%	52	4.50%	0.2790
	2048	72,381	1,941,704	2682.6%	19,326	518,435	2682.6%	40	4.50%	0.2670
	2049	56,198	1,620,092	2882.8%	14,359	413,937	2882.8%	31	4.50%	0.2555
	2050	43,147	1,333,770	3091.2%	10,550	326,107	3091.2%	24	4.50%	0.2445
	2051	32,745	1,083,186	3307.9%	7,661	253,434	3307.9%	18	4.50%	0.2340
	2052	24,554	867,052	3531.2%	5,497	194,129	3531.2%	13	4.50%	0.2239
	2053	18,183	683,948	3761.5%	3,896	146,539	3761.5%	10	4.50%	0.2143
	2054	13,291	531,624	3999.8%	2,725	108,998	3999.8%	7	4.50%	0.2050
	2055	9,586	406,962	4245.4%	1,881	79,846	4245.4%	5	4.50%	0.1962
	2056	6,818	306,514	4495.7%	1,280	57,548	4495.7%	4	4.50%	0.1878
	2057	4,780	227,182	4753.2%	859	40,817	4753.2%	2	4.50%	0.1797
	2058	3,301	165,488	5013.7%	567	28,452	5013.7%	2	4.50%	0.1719
	2059	2,244	118,400	5275.7%	369	19,480	5275.7%	1	4.50%	0.1645
	2060	1,501	83,088	5534.8%	236	13,081	5534.8%	1	4.50%	0.1574
	2061	987	57,175	5793.2%	149	8,614	5793.2%	0	4.50%	0.1507
	2062	637	38,520	6049.0%	92	5,554	6049.0%	0	4.50%	0.1442
	2063	403	25,329	6292.4%	56	3,494	6292.4%	0	4.50%	0.1380
	2064	249	16,237	6529.5%	33	2,144	6529.5%	0	4.50%	0.1320
	2065	150	10,128	6767.4%	19	1,280	6767.4%	0	4.50%	0.1263
	2066	87	6,127	7009.6%	11	741	7009.6%	0	4.50%	0.1209
	2067	49	3,579	7261.2%	6	414	7261.2%	0	4.50%	0.1157
	2068	15	1,154	7474.1%	2	128	7474.1%	0	4.50%	0.1107
	Past	45,193,523	11,745,216	26.0%	67,014,552	15,000,125	22.4%			
	Future	35,329,244	156,542,367	443.1%	24,857,517	83,783,756	337.1%			
	Lifetime	80,522,768	168,287,584	209.0%	91,872,070	98,783,881	107.5%			

Exhibit 10
RiverSource Life Insurance Company
Virginia Experience
With Requested Premium Rate Increase, Spread Over Three Years
Policy Form 30160A-VA, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Ending Policies Inforce	Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Loss Ratio	Earned Premiums	Incurred Claims	Loss Ratio			
Historical Experience	2000	155,749	0	0.0%	343,969	0	0.0%	510	4.50%	2.2085
	2001	1,237,018	0	0.0%	2,614,285	0	0.0%	1,213	4.50%	2.1134
	2002	2,248,430	193,326	8.6%	4,547,158	390,976	8.6%	1,908	4.50%	2.0224
	2003	2,804,625	0	0.0%	5,427,742	0	0.0%	1,881	4.50%	1.9353
	2004	2,693,301	334,456	12.4%	4,987,844	619,394	12.4%	1,839	4.50%	1.8519
	2005	2,640,412	791,847	30.0%	4,679,328	1,403,308	30.0%	1,810	4.50%	1.7722
	2006	2,599,342	18,125	0.7%	4,408,175	30,738	0.7%	1,793	4.50%	1.6959
	2007	2,581,592	520,898	20.2%	4,189,544	845,341	20.2%	1,762	4.50%	1.6229
	2008	2,671,579	577,532	21.6%	4,148,880	896,890	21.6%	1,731	4.50%	1.5530
	2009	2,670,237	605,672	22.7%	3,968,227	900,086	22.7%	1,709	4.50%	1.4861
	2010	2,628,436	21,117	0.8%	3,737,900	30,031	0.8%	1,690	4.50%	1.4221
	2011	2,593,661	394,571	15.2%	3,529,615	536,957	15.2%	1,671	4.50%	1.3609
	2012	2,635,478	1,038,907	39.4%	3,432,078	1,352,927	39.4%	1,654	4.50%	1.3023
	2013	2,739,922	887,558	32.4%	3,414,441	1,106,059	32.4%	1,622	4.50%	1.2462
	2014	2,682,062	521,053	19.4%	3,198,409	621,366	19.4%	1,597	4.50%	1.1925
	2015	2,672,597	1,330,631	49.8%	3,049,878	1,518,471	49.8%	1,560	4.50%	1.1412
	2016	2,805,362	1,628,017	58.0%	3,063,526	1,777,835	58.0%	1,532	4.50%	1.0920
	2017	2,772,800	1,660,730	59.9%	2,897,576	1,735,462	59.9%	1,511	4.50%	1.0450
	1/1/2018-6/30/2018	1,360,920	1,220,777	89.7%	1,375,978	1,234,285	89.7%	1,501	4.50%	1.0111
Projected Future Experience	7/1/2018-12/31/2018	1,354,811	1,385,657	102.3%	1,339,984	1,370,493	102.3%	1,479	4.50%	0.9891
	2019	2,909,975	2,996,585	103.0%	2,784,665	2,867,545	103.0%	1,416	4.50%	0.9569
	2020	3,430,916	3,339,751	97.3%	3,141,792	3,058,310	97.3%	1,368	4.50%	0.9157
	2021	3,312,927	3,650,396	110.2%	2,903,107	3,198,829	110.2%	1,319	4.50%	0.8763
	2022	3,173,948	3,956,311	124.6%	2,661,550	3,317,610	124.6%	1,268	4.50%	0.8386
	2023	3,027,812	4,258,080	140.6%	2,429,671	3,416,900	140.6%	1,213	4.50%	0.8025
	2024	2,875,309	4,567,415	158.8%	2,207,937	3,507,298	158.8%	1,156	4.50%	0.7679
	2025	2,717,501	4,901,582	180.4%	1,996,897	3,601,822	180.4%	1,095	4.50%	0.7348
	2026	2,554,643	5,234,613	204.9%	1,796,387	3,680,902	204.9%	1,032	4.50%	0.7032
	2027	2,387,849	5,549,434	232.4%	1,606,794	3,734,238	232.4%	968	4.50%	0.6729
	2028	2,217,635	5,839,075	263.3%	1,427,997	3,759,942	263.3%	901	4.50%	0.6439
	2029	2,045,347	6,077,713	297.1%	1,260,340	3,745,079	297.1%	832	4.50%	0.6162
	2030	1,873,336	6,257,093	334.0%	1,104,639	3,689,581	334.0%	764	4.50%	0.5897
	2031	1,704,315	6,384,600	374.6%	961,696	3,602,649	374.6%	696	4.50%	0.5643
	2032	1,539,467	6,451,959	419.1%	831,270	3,483,883	419.1%	630	4.50%	0.5400
	2033	1,380,163	6,458,690	468.0%	713,158	3,337,337	468.0%	565	4.50%	0.5167
	2034	1,228,111	6,417,699	522.6%	607,263	3,173,355	522.6%	504	4.50%	0.4945
	2035	1,084,464	6,321,973	583.0%	513,143	2,991,409	583.0%	445	4.50%	0.4732
	2036	949,650	6,164,931	649.2%	430,002	2,791,483	649.2%	390	4.50%	0.4528
	2037	824,325	5,951,393	722.0%	357,181	2,578,749	722.0%	339	4.50%	0.4333
	2038	709,779	5,691,871	801.9%	294,305	2,360,094	801.9%	292	4.50%	0.4146
	2039	606,330	5,394,379	889.7%	240,584	2,140,422	889.7%	249	4.50%	0.3968
	2040	513,733	5,058,869	984.7%	195,065	1,920,857	984.7%	211	4.50%	0.3797
	2041	431,584	4,676,817	1083.6%	156,816	1,699,322	1083.6%	178	4.50%	0.3634
	2042	359,378	4,258,228	1184.9%	124,957	1,480,601	1184.9%	148	4.50%	0.3477
	2043	296,527	3,822,538	1289.1%	98,663	1,271,876	1289.1%	122	4.50%	0.3327
	2044	242,367	3,393,041	1400.0%	77,170	1,080,353	1400.0%	99	4.50%	0.3184
	2045	196,184	2,976,285	1517.1%	59,776	906,848	1517.1%	80	4.50%	0.3047
	2046	157,222	2,579,050	1640.4%	45,841	751,975	1640.4%	64	4.50%	0.2916
	2047	124,712	2,206,987	1769.7%	34,797	615,782	1769.7%	51	4.50%	0.2790
	2048	97,886	1,865,050	1905.3%	26,136	497,968	1905.3%	40	4.50%	0.2670
	2049	76,001	1,555,961	2047.3%	19,418	397,552	2047.3%	31	4.50%	0.2555
	2050	58,351	1,280,839	2195.1%	14,267	313,165	2195.1%	23	4.50%	0.2445
	2051	44,284	1,040,098	2348.7%	10,361	243,353	2348.7%	18	4.50%	0.2340
	2052	33,206	832,486	2507.1%	7,435	186,390	2507.1%	13	4.50%	0.2239
	2053	24,590	656,626	2670.3%	5,268	140,685	2670.3%	10	4.50%	0.2143
	2054	17,975	510,346	2839.2%	3,685	104,635	2839.2%	7	4.50%	0.2050
	2055	12,964	390,644	3013.3%	2,543	76,644	3013.3%	5	4.50%	0.1962
	2056	9,220	294,204	3190.8%	1,731	55,237	3190.8%	4	4.50%	0.1878
	2057	6,464	218,044	3373.4%	1,161	39,175	3373.4%	2	4.50%	0.1797
	2058	4,464	158,822	3558.0%	767	27,306	3558.0%	2	4.50%	0.1719
	2059	3,035	113,624	3743.8%	499	18,694	3743.8%	1	4.50%	0.1645
	2060	2,030	79,733	3927.4%	320	12,553	3927.4%	1	4.50%	0.1574
	2061	1,335	54,863	4110.6%	201	8,266	4110.6%	0	4.50%	0.1507
	2062	861	36,961	4291.9%	124	5,329	4291.9%	0	4.50%	0.1442
	2063	544	24,303	4464.4%	75	3,353	4464.4%	0	4.50%	0.1380
	2064	336	15,578	4632.5%	44	2,057	4632.5%	0	4.50%	0.1320
	2065	202	9,717	4801.1%	26	1,228	4801.1%	0	4.50%	0.1263
	2066	118	5,878	4972.7%	14	711	4972.7%	0	4.50%	0.1209
	2067	67	3,433	5151.1%	8	397	5151.1%	0	4.50%	0.1157
	2068	21	1,107	5302.0%	2	123	5302.0%	0	4.50%	0.1107
Past Future Lifetime	Past	45,193,523	11,745,216	26.0%	67,014,552	15,000,125	22.4%			
	Future	46,624,276	151,371,332	324.7%	32,497,538	81,270,365	250.1%			
	Lifetime	91,817,799	163,116,548	177.7%	99,512,091	96,270,490	96.7%			

Exhibit 11
RiverSource Life Insurance Company
Historical Nationwide Experience
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis
Before Premium Rate Increase
Policy Form 30160A, Subject to Endorsement Form 32100

Calendar Year	Loss Ratios Without Interest					Loss Ratios With Interest					Interest Rate	Mid-Year Disc / Accum Factor
	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
2000	3,315,109	0	0	0.0%	0.0%	7,321,347	0	0	0.0%	0.0%	4.50%	2.2085
2001	26,852,721	21,276	521,781	0.1%	1.9%	56,749,919	44,965	1,102,720	0.1%	1.9%	4.50%	2.1134
2002	48,214,639	137,299	2,040,754	0.3%	4.2%	97,507,846	277,670	4,127,160	0.3%	4.2%	4.50%	2.0224
2003	58,070,154	556,372	1,472,260	1.0%	2.5%	112,382,149	1,076,738	2,849,239	1.0%	2.5%	4.50%	1.9353
2004	55,090,562	985,329	4,398,931	1.8%	8.0%	102,024,686	1,824,776	8,146,578	1.8%	8.0%	4.50%	1.8519
2005	53,268,754	1,787,976	7,196,848	3.4%	13.5%	94,402,677	3,168,644	12,754,225	3.4%	13.5%	4.50%	1.7722
2006	51,919,262	2,925,405	6,355,511	5.6%	12.2%	88,048,912	4,961,140	10,778,193	5.6%	12.2%	4.50%	1.6959
2007	50,887,586	4,416,093	13,593,018	8.7%	26.7%	82,583,075	7,166,670	22,059,470	8.7%	26.7%	4.50%	1.6229
2008	51,986,263	6,429,445	9,365,215	12.4%	18.0%	80,733,076	9,984,732	14,543,892	12.4%	18.0%	4.50%	1.5530
2009	51,336,473	8,383,180	18,401,932	16.3%	35.8%	76,290,884	12,458,202	27,347,022	16.3%	35.8%	4.50%	1.4861
2010	50,101,940	11,353,568	18,094,255	22.7%	36.1%	71,249,999	16,145,916	25,731,852	22.7%	36.1%	4.50%	1.4221
2011	48,882,784	14,649,827	25,185,480	30.0%	51.5%	66,522,714	19,936,391	34,273,959	30.0%	51.5%	4.50%	1.3609
2012	49,181,850	17,896,429	27,554,995	36.4%	56.0%	64,047,563	23,305,805	35,883,771	36.4%	56.0%	4.50%	1.3023
2013	50,935,676	20,868,950	26,676,965	41.0%	52.4%	63,475,119	26,006,509	33,244,352	41.0%	52.4%	4.50%	1.2462
2014	49,602,165	23,223,222	28,164,229	46.8%	56.8%	59,151,504	27,694,124	33,586,367	46.8%	56.8%	4.50%	1.1925
2015	49,085,442	27,697,679	45,884,468	56.4%	93.5%	56,014,644	31,607,653	52,361,800	56.4%	93.5%	4.50%	1.1412
2016	51,249,717	32,904,561	48,083,527	64.2%	93.8%	55,965,972	35,932,603	52,508,414	64.2%	93.8%	4.50%	1.0920
2017	49,881,151	37,114,872	50,194,526	74.4%	100.6%	52,125,802	38,785,042	52,453,280	74.4%	100.6%	4.50%	1.0450
1/1/2018-6/30/2018	24,154,154	17,266,166	32,925,206	71.5%	136.3%	24,421,420	17,457,216	33,289,523	71.5%	136.3%	4.50%	1.0111
Total	874,016,400	228,617,649	366,109,899	26.2%	41.9%	1,311,019,308	277,834,794	457,041,815	21.2%	34.9%		

Exhibit 12
RiverSource Life Insurance Company
Historical Virginia Experience
Before Premium Rate Increase
Policy Form 30160A-VA, Subject to Endorsement Form 32100

Calendar Year	Loss Ratios Without Interest					Loss Ratios With Interest					Interest Rate	Mid-Year Disc / Accum Factor
	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio	Earned Premiums	Paid Claims	Incurred Claims	Paid Loss Ratio	Incurred Loss Ratio		
2000	155,749	0	0	0.0%	0.0%	343,969	0	0	0.0%	0.0%	4.50%	2.2085
2001	1,237,018	0	0	0.0%	0.0%	2,614,285	0	0	0.0%	0.0%	4.50%	2.1134
2002	2,248,430	1,057	193,326	0.0%	8.6%	4,547,158	2,138	390,976	0.0%	8.6%	4.50%	2.0224
2003	2,804,625	45,916	0	1.6%	0.0%	5,427,742	88,860	0	1.6%	0.0%	4.50%	1.9353
2004	2,693,301	92,508	334,456	3.4%	12.4%	4,987,844	171,319	619,394	3.4%	12.4%	4.50%	1.8519
2005	2,640,412	139,641	791,847	5.3%	30.0%	4,679,328	247,471	1,403,308	5.3%	30.0%	4.50%	1.7722
2006	2,599,342	152,174	18,125	5.9%	0.7%	4,408,175	258,069	30,738	5.9%	0.7%	4.50%	1.6959
2007	2,581,592	297,760	520,898	11.5%	20.2%	4,189,544	483,220	845,341	11.5%	20.2%	4.50%	1.6229
2008	2,671,579	345,542	577,532	12.9%	21.6%	4,148,880	536,616	896,890	12.9%	21.6%	4.50%	1.5530
2009	2,670,237	480,838	605,672	18.0%	22.7%	3,968,227	714,572	900,086	18.0%	22.7%	4.50%	1.4861
2010	2,628,436	566,344	21,117	21.5%	0.8%	3,737,900	805,398	30,031	21.5%	0.8%	4.50%	1.4221
2011	2,593,661	520,896	394,571	20.1%	15.2%	3,529,615	708,867	536,957	20.1%	15.2%	4.50%	1.3609
2012	2,635,478	373,895	1,038,907	14.2%	39.4%	3,432,078	486,909	1,352,927	14.2%	39.4%	4.50%	1.3023
2013	2,739,922	554,363	887,558	20.2%	32.4%	3,414,441	690,838	1,106,059	20.2%	32.4%	4.50%	1.2462
2014	2,682,062	629,610	521,053	23.5%	19.4%	3,198,409	750,822	621,366	23.5%	19.4%	4.50%	1.1925
2015	2,672,597	815,768	1,330,631	30.5%	49.8%	3,049,878	930,926	1,518,471	30.5%	49.8%	4.50%	1.1412
2016	2,805,362	858,402	1,628,017	30.6%	58.0%	3,063,526	937,396	1,777,835	30.6%	58.0%	4.50%	1.0920
2017	2,772,800	811,630	1,660,730	29.3%	59.9%	2,897,576	848,153	1,735,462	29.3%	59.9%	4.50%	1.0450
1/1/2018-6/30/2018	1,360,920	488,809	1,220,777	35.9%	89.7%	1,375,978	494,217	1,234,285	35.9%	89.7%	4.50%	1.0111
Total	45,193,523	7,175,152	11,745,216	15.9%	26.0%	67,014,552	9,155,791	15,000,125	13.7%	22.4%		

Exhibit 13
RiverSource Life Insurance Company
Incurred Loss Ratios Including the Change in Active Life Reserves, Without Interest

Nationwide Experience				
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis				
Policy Form 30160A, Subject to Endorsement Form 32100				
Calendar Year	(A) Earned Premiums	(B) Incurred Claims	(C) Change in Active Life Reserves	(D) = (B+C) / (A) Incurred Loss Ratio
2000	3,315,109	0	5,107,758	154.1%
2001	26,852,721	521,781	8,405,957	33.2%
2002	48,214,639	2,040,754	30,347,643	67.2%
2003	58,070,154	1,472,260	46,913,547	83.3%
2004	55,090,562	4,398,931	57,452,858	112.3%
2005	53,268,754	7,196,848	56,283,231	119.2%
2006	51,919,262	6,355,511	55,810,732	119.7%
2007	50,887,586	13,593,018	66,244,850	156.9%
2008	51,986,263	9,365,215	54,059,116	122.0%
2009	51,336,473	18,401,932	55,652,769	144.3%
2010	50,101,940	18,094,255	56,832,582	149.5%
2011	48,882,784	25,185,480	(38,302,524)	-26.8%
2012	49,181,850	27,554,995	45,838,077	149.2%
2013	50,935,676	26,676,965	43,788,042	138.3%
2014	49,602,165	28,164,229	43,199,507	143.9%
2015	49,085,442	45,884,468	44,395,954	183.9%
2016	51,249,717	48,083,527	38,490,392	168.9%
2017	49,881,151	50,194,526	38,295,875	177.4%
1/1/2018-6/30/2018	24,154,154	32,925,206	12,193,356	186.8%
Total	874,016,400	366,109,899	721,009,722	124.4%

Virginia Experience				
Policy Form 30160A-VA, Subject to Endorsement Form 32100				
Calendar Year	(A) Earned Premiums	(B) Incurred Claims	(C) Change in Active Life Reserves	(D) = (B+C) / (A) Incurred Loss Ratio
2000	155,749	0	162,825	104.5%
2001	1,237,018	0	353,274	28.6%
2002	2,248,430	193,326	1,448,086	73.0%
2003	2,804,625	0	2,282,154	81.4%
2004	2,693,301	334,456	2,866,018	118.8%
2005	2,640,412	791,847	2,812,734	136.5%
2006	2,599,342	18,125	2,799,131	108.4%
2007	2,581,592	520,898	4,307,227	187.0%
2008	2,671,579	577,532	3,045,700	135.6%
2009	2,670,237	605,672	3,229,438	143.6%
2010	2,628,436	21,117	3,359,320	128.6%
2011	2,593,661	394,571	(1,992,178)	-61.6%
2012	2,635,478	1,038,907	2,787,698	145.2%
2013	2,739,922	887,558	2,566,019	126.0%
2014	2,682,062	521,053	2,728,556	121.2%
2015	2,672,597	1,330,631	2,536,146	144.7%
2016	2,805,362	1,628,017	2,650,664	152.5%
2017	2,772,800	1,660,730	2,935,224	165.8%
1/1/2018-6/30/2018	1,360,920	1,220,777	1,070,705	168.4%
Total	45,193,523	11,745,216	41,948,741	118.8%

RiverSource Life Insurance Company
Anticipated Incurred Loss Ratio Calculation With Statutory Active Life Reserve

Nationwide Experience Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis Policy Form 30160A, Subject to Endorsement Form 32100		
	Before Premium Rate Increase	With Requested Premium Rate Increase, Spread Over Three Years
1 Present Value of Future Claims	1,444,261,711	1,402,312,766
2 Statutory Active Life Reserves as of 6/30/2018	721,009,722	721,009,722
3 Present Value of Future Premiums	421,300,267	550,046,441
Anticipated Incurred Loss Ratio = (1 - 2) / 3	171.7%	123.9%

Virginia Experience Policy Form 30160A-VA, Subject to Endorsement Form 32100		
	Before Premium Rate Increase	With Requested Premium Rate Increase, Spread Over Three Years
1 Present Value of Future Claims	83,783,756	81,270,365
2 Statutory Active Life Reserves as of 6/30/2018	41,948,741	41,948,741
3 Present Value of Future Premiums	24,857,517	32,497,538
Anticipated Incurred Loss Ratio = (1 - 2) / 3	168.3%	121.0%

Exhibit 15
Demonstration of Compliance with Dual-Loss Ratio Standard
For Individual Long-Term Care with Prescribed Factors¹

Nationwide Experience Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis Policy Form 30160A, Subject to Endorsement Form 32100				
1a	Accumulated value of past earned premiums	1,311,019,308	x 62.8% =	823,320,126
1b	Present value of future projected earned premiums at current level	421,300,267	x 62.8% =	264,576,568
2	Present value of increased portion of future projected earned premiums	128,746,174	x 80.0% =	102,996,939
3	Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2	1,861,065,749		1,190,893,633
4	Lifetime Incurred Claims with Rate Increase			1,859,354,581
5	Test: 4 is not less than 3			TRUE

Virginia Experience Policy Form 30160A-VA, Subject to Endorsement Form 32100				
1a	Accumulated value of past earned premiums	67,014,552	x 62.8% =	42,085,139
1b	Present value of future projected earned premiums at current level	24,857,517	x 62.8% =	15,610,521
2	Present value of increased portion of future projected earned premiums	7,640,021	x 80.0% =	6,112,017
3	Lifetime Earned Premium Times Prescribed Factor: Sum of 1a, 1b and 2	99,512,091		63,807,676
4	Lifetime Incurred Claims with Rate Increase			96,270,490
5	Test: 4 is not less than 3			TRUE

¹ As prescribed by NAIC Model Bulletin, where 62.8% is the lifetime loss ratio at the time of original pricing

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD																		
No Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
41	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
42	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
43	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
44	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
45	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
46	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
47	75.88	106.24	40.0%	87.18	122.06	40.0%	98.50	137.90	40.0%	62.56	87.58	40.0%	72.56	101.58	40.0%	82.52	115.52	40.0%
48	75.88	106.24	40.0%	87.18	122.06	40.0%	98.50	137.90	40.0%	65.24	91.34	40.0%	75.22	105.30	40.0%	85.18	119.26	40.0%
49	79.86	111.80	40.0%	91.86	128.60	40.0%	103.82	145.34	40.0%	66.56	93.18	40.0%	77.20	108.08	40.0%	87.84	122.98	40.0%
50	79.86	111.80	40.0%	91.86	128.60	40.0%	103.82	145.34	40.0%	69.22	96.90	40.0%	79.86	111.80	40.0%	90.50	126.70	40.0%
51	82.52	115.52	40.0%	95.84	134.18	40.0%	109.14	152.80	40.0%	70.56	98.78	40.0%	81.86	114.60	40.0%	93.18	130.46	40.0%
52	85.18	119.26	40.0%	98.50	137.90	40.0%	111.80	156.52	40.0%	70.56	98.78	40.0%	81.86	114.60	40.0%	93.18	130.46	40.0%
53	86.52	121.12	40.0%	100.50	140.70	40.0%	114.46	160.24	40.0%	77.20	108.08	40.0%	89.18	124.86	40.0%	101.16	141.62	40.0%
54	86.52	121.12	40.0%	100.50	140.70	40.0%	114.46	160.24	40.0%	77.20	108.08	40.0%	89.18	124.86	40.0%	101.16	141.62	40.0%
55	90.50	126.70	40.0%	105.16	147.22	40.0%	119.80	167.72	40.0%	82.52	115.52	40.0%	95.84	134.18	40.0%	109.14	152.80	40.0%
56	97.18	136.06	40.0%	112.48	157.48	40.0%	127.78	178.90	40.0%	85.18	119.26	40.0%	98.50	137.90	40.0%	111.80	156.52	40.0%
57	106.48	149.08	40.0%	122.46	171.44	40.0%	138.42	193.78	40.0%	91.86	128.60	40.0%	105.82	148.14	40.0%	119.80	167.72	40.0%
58	113.14	158.40	40.0%	129.78	181.70	40.0%	146.42	204.98	40.0%	98.50	137.90	40.0%	113.14	158.40	40.0%	127.78	178.90	40.0%
59	119.80	167.72	40.0%	137.10	191.94	40.0%	154.40	216.16	40.0%	105.16	147.22	40.0%	120.48	168.68	40.0%	135.76	190.06	40.0%
60	130.44	182.62	40.0%	149.08	208.72	40.0%	167.70	234.78	40.0%	111.80	156.52	40.0%	127.78	178.90	40.0%	143.74	201.24	40.0%
61	137.10	191.94	40.0%	156.40	218.96	40.0%	175.70	245.98	40.0%	117.12	163.96	40.0%	133.10	186.34	40.0%	149.08	208.72	40.0%
62	143.74	201.24	40.0%	163.72	229.20	40.0%	183.68	257.16	40.0%	121.14	169.60	40.0%	137.76	192.86	40.0%	154.40	216.16	40.0%
63	150.42	210.58	40.0%	171.06	239.48	40.0%	191.66	268.32	40.0%	130.44	182.62	40.0%	147.76	206.86	40.0%	165.04	231.06	40.0%
64	159.72	223.60	40.0%	181.02	253.42	40.0%	202.32	283.24	40.0%	138.42	193.78	40.0%	157.06	219.88	40.0%	175.70	245.98	40.0%
65	169.04	236.66	40.0%	192.34	269.28	40.0%	215.62	301.86	40.0%	145.10	203.14	40.0%	164.38	230.14	40.0%	183.68	257.16	40.0%
66	198.34	277.68	40.0%	222.94	312.12	40.0%	247.56	346.58	40.0%	169.04	236.66	40.0%	189.68	265.56	40.0%	210.30	294.42	40.0%
67	231.60	324.24	40.0%	258.22	361.50	40.0%	284.84	398.78	40.0%	201.00	281.40	40.0%	224.30	314.02	40.0%	247.56	346.58	40.0%
68	263.54	368.96	40.0%	292.82	409.94	40.0%	322.10	450.94	40.0%	226.28	316.80	40.0%	251.58	352.22	40.0%	276.84	387.58	40.0%
69	299.48	419.28	40.0%	330.78	463.10	40.0%	362.04	506.86	40.0%	254.24	355.94	40.0%	281.52	394.12	40.0%	308.80	432.32	40.0%
70	331.44	464.02	40.0%	365.38	511.54	40.0%	399.30	559.02	40.0%	280.86	393.20	40.0%	310.80	435.12	40.0%	340.74	477.04	40.0%
71	360.72	505.00	40.0%	395.98	554.38	40.0%	431.24	603.74	40.0%	307.48	430.48	40.0%	338.76	474.26	40.0%	370.02	518.02	40.0%
72	396.64	555.30	40.0%	433.90	607.46	40.0%	471.18	659.66	40.0%	334.10	467.74	40.0%	368.04	515.26	40.0%	401.96	562.74	40.0%
73	428.58	600.02	40.0%	468.52	655.92	40.0%	508.44	711.82	40.0%	362.04	506.86	40.0%	397.98	557.18	40.0%	433.90	607.46	40.0%
74	459.20	642.88	40.0%	501.14	701.60	40.0%	543.04	760.26	40.0%	388.66	544.12	40.0%	427.26	598.16	40.0%	465.86	652.20	40.0%
75	496.48	695.08	40.0%	541.06	757.48	40.0%	585.64	819.90	40.0%	419.28	587.00	40.0%	459.86	643.80	40.0%	500.46	700.64	40.0%
76	536.40	750.96	40.0%	586.32	820.84	40.0%	636.22	890.70	40.0%	453.88	635.44	40.0%	499.80	699.72	40.0%	545.72	764.00	40.0%
77	579.00	810.60	40.0%	634.24	887.94	40.0%	689.46	965.24	40.0%	488.48	683.88	40.0%	539.72	755.60	40.0%	590.96	827.34	40.0%
78	618.92	866.48	40.0%	679.50	951.30	40.0%	740.04	999.98	35.1%	523.10	732.34	40.0%	579.66	811.52	40.0%	636.22	890.70	40.0%
79	661.52	926.12	40.0%	727.40	999.98	37.5%	793.28	999.98	26.1%	557.70	780.78	40.0%	619.58	867.42	40.0%	681.48	954.08	40.0%

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD																		
Simple Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	118.48	165.88	40.0%	135.10	189.14	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
41	118.48	165.88	40.0%	135.10	189.14	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
42	118.48	165.88	40.0%	135.10	189.14	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
43	118.48	165.88	40.0%	135.10	189.14	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
44	118.48	165.88	40.0%	135.10	189.14	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
45	118.48	165.88	40.0%	135.10	189.14	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
46	121.14	169.60	40.0%	137.76	192.86	40.0%	154.40	216.16	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
47	127.78	178.90	40.0%	145.10	203.14	40.0%	162.38	227.34	40.0%	113.14	158.40	40.0%	128.46	179.84	40.0%	143.74	201.24	40.0%
48	133.10	186.34	40.0%	151.74	212.44	40.0%	170.36	238.50	40.0%	115.80	162.12	40.0%	131.12	183.56	40.0%	146.42	204.98	40.0%
49	135.76	190.06	40.0%	154.40	216.16	40.0%	173.04	242.26	40.0%	117.12	163.96	40.0%	133.10	186.34	40.0%	149.08	208.72	40.0%
50	139.76	195.66	40.0%	159.06	222.68	40.0%	178.36	249.70	40.0%	119.80	167.72	40.0%	135.76	190.06	40.0%	151.74	212.44	40.0%
51	143.74	201.24	40.0%	163.72	229.20	40.0%	183.68	257.16	40.0%	126.46	177.04	40.0%	143.08	200.32	40.0%	159.72	223.60	40.0%
52	146.42	204.98	40.0%	166.38	232.94	40.0%	186.34	260.88	40.0%	126.46	177.04	40.0%	143.08	200.32	40.0%	159.72	223.60	40.0%
53	150.42	210.58	40.0%	171.06	239.48	40.0%	191.66	268.32	40.0%	130.44	182.62	40.0%	147.76	206.86	40.0%	165.04	231.06	40.0%
54	157.06	219.88	40.0%	178.36	249.70	40.0%	199.66	279.52	40.0%	133.10	186.34	40.0%	150.42	210.58	40.0%	167.70	234.78	40.0%
55	161.06	225.48	40.0%	183.02	256.22	40.0%	204.98	286.98	40.0%	138.42	193.78	40.0%	157.06	219.88	40.0%	175.70	245.98	40.0%
56	171.72	240.40	40.0%	195.00	273.00	40.0%	218.28	305.60	40.0%	147.76	206.86	40.0%	167.04	233.86	40.0%	186.34	260.88	40.0%
57	183.68	257.16	40.0%	207.64	290.70	40.0%	231.60	324.24	40.0%	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%
58	193.00	270.20	40.0%	217.62	304.66	40.0%	242.24	339.14	40.0%	169.04	236.66	40.0%	189.68	265.56	40.0%	210.30	294.42	40.0%
59	207.64	290.70	40.0%	232.94	326.12	40.0%	258.22	361.50	40.0%	181.02	253.42	40.0%	202.32	283.24	40.0%	223.60	313.04	40.0%
60	216.96	303.74	40.0%	242.92	340.08	40.0%	268.86	376.40	40.0%	195.66	273.92	40.0%	218.96	306.54	40.0%	242.24	339.14	40.0%
61	228.94	320.52	40.0%	255.56	357.78	40.0%	282.18	395.06	40.0%	207.64	290.70	40.0%	231.60	324.24	40.0%	255.56	357.78	40.0%
62	240.92	337.28	40.0%	268.20	375.48	40.0%	295.48	413.68	40.0%	216.96	303.74	40.0%	241.58	338.22	40.0%	266.20	372.68	40.0%
63	254.24	355.94	40.0%	282.86	396.00	40.0%	311.46	436.04	40.0%	228.94	320.52	40.0%	254.24	355.94	40.0%	279.52	391.32	40.0%
64	263.54	368.96	40.0%	292.82	409.94	40.0%	322.10	450.94	40.0%	238.26	333.56	40.0%	264.22	369.90	40.0%	290.16	406.22	40.0%
65	279.52	391.32	40.0%	310.14	434.20	40.0%	340.74	477.04	40.0%	254.24	355.94	40.0%	281.52	394.12	40.0%	308.80	432.32	40.0%
66	323.44	452.82	40.0%	356.04	498.46	40.0%	388.66	544.12	40.0%	290.16	406.22	40.0%	319.44	447.22	40.0%	348.72	488.20	40.0%
67	368.70	516.18	40.0%	403.96	565.54	40.0%	439.24	614.94	40.0%	328.76	460.26	40.0%	360.06	504.08	40.0%	391.32	547.84	40.0%
68	412.62	577.66	40.0%	449.88	629.84	40.0%	487.14	682.00	40.0%	368.70	516.18	40.0%	402.64	563.70	40.0%	436.56	611.18	40.0%
69	455.20	637.28	40.0%	495.14	693.20	40.0%	535.06	749.08	40.0%	409.94	573.92	40.0%	445.90	624.26	40.0%	481.82	674.54	40.0%
70	500.46	700.64	40.0%	543.04	760.26	40.0%	585.64	819.90	40.0%	447.22	626.10	40.0%	485.82	680.14	40.0%	524.42	734.18	40.0%
71	545.72	764.00	40.0%	590.96	827.34	40.0%	636.22	890.70	40.0%	484.48	678.28	40.0%	524.42	734.18	40.0%	564.34	790.08	40.0%
72	589.64	825.50	40.0%	636.90	891.66	40.0%	684.14	957.80	40.0%	525.76	736.06	40.0%	567.68	794.76	40.0%	609.60	853.44	40.0%
73	634.90	888.86	40.0%	684.82	958.74	40.0%	734.72	999.98	36.1%	563.02	788.22	40.0%	607.62	850.66	40.0%	652.20	913.08	40.0%
74	678.82	950.34	40.0%	730.74	999.98	36.8%	782.62	999.98	27.8%	601.62	842.26	40.0%	648.20	907.48	40.0%	694.78	972.70	40.0%
75	728.06	999.98	37.3%	783.32	999.98	27.7%	838.54	999.98	19.3%	644.20	901.88	40.0%	693.46	970.84	40.0%	742.70	999.98	34.6%
76	782.62	999.98	27.8%	843.86	999.98	18.5%	905.08	999.98	10.5%	693.46	970.84	40.0%	748.70	999.98	33.6%	803.92	999.98	24.4%
77	839.88	999.98	19.1%	907.08	999.98	10.2%	974.30	999.98	2.6%	740.04	999.98	35.1%	801.26	999.98	24.8%	862.48	999.98	15.9%
78	894.44	999.98	11.8%	967.64	999.98	3.3%	999.98	999.98	0.0%	789.30	999.98	26.7%	856.50	999.98	16.8%	923.72	999.98	8.3%
79	951.68	999.98	5.1%	999.98	999.98	0.0%	999.98	999.98	0.0%	841.20	999.98	18.9%	915.72	999.98	9.2%	990.26	999.98	1.0%

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD																		
Compound Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%	143.74	201.24	40.0%	161.06	225.48	40.0%	178.36	249.70	40.0%
41	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%	143.74	201.24	40.0%	161.06	225.48	40.0%	178.36	249.70	40.0%
42	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%	143.74	201.24	40.0%	161.06	225.48	40.0%	178.36	249.70	40.0%
43	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%	143.74	201.24	40.0%	161.06	225.48	40.0%	178.36	249.70	40.0%
44	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%	143.74	201.24	40.0%	161.06	225.48	40.0%	178.36	249.70	40.0%
45	159.72	223.60	40.0%	179.70	251.58	40.0%	199.66	279.52	40.0%	143.74	201.24	40.0%	161.06	225.48	40.0%	178.36	249.70	40.0%
46	165.04	231.06	40.0%	185.02	259.02	40.0%	204.98	286.98	40.0%	149.08	208.72	40.0%	166.38	232.94	40.0%	183.68	257.16	40.0%
47	171.72	240.40	40.0%	192.34	269.28	40.0%	212.96	298.14	40.0%	154.40	216.16	40.0%	173.04	242.26	40.0%	191.66	268.32	40.0%
48	181.02	253.42	40.0%	202.32	283.24	40.0%	223.60	313.04	40.0%	158.40	221.76	40.0%	177.70	248.78	40.0%	196.98	275.78	40.0%
49	187.68	262.76	40.0%	209.64	293.50	40.0%	231.60	324.24	40.0%	163.72	229.20	40.0%	183.02	256.22	40.0%	202.32	283.24	40.0%
50	201.00	281.40	40.0%	224.30	314.02	40.0%	247.56	346.58	40.0%	167.70	234.78	40.0%	187.68	262.76	40.0%	207.64	290.70	40.0%
51	206.32	288.84	40.0%	229.62	321.46	40.0%	252.90	354.06	40.0%	171.72	240.40	40.0%	192.34	269.28	40.0%	212.96	298.14	40.0%
52	212.96	298.14	40.0%	236.92	331.68	40.0%	260.88	365.24	40.0%	179.70	251.58	40.0%	200.34	280.48	40.0%	220.94	309.32	40.0%
53	219.62	307.46	40.0%	244.24	341.94	40.0%	268.86	376.40	40.0%	183.68	257.16	40.0%	204.98	286.98	40.0%	226.28	316.80	40.0%
54	228.94	320.52	40.0%	254.24	355.94	40.0%	279.52	391.32	40.0%	187.68	262.76	40.0%	209.64	293.50	40.0%	231.60	324.24	40.0%
55	238.26	333.56	40.0%	264.22	369.90	40.0%	290.16	406.22	40.0%	195.66	273.92	40.0%	218.96	306.54	40.0%	242.24	339.14	40.0%
56	252.90	354.06	40.0%	279.52	391.32	40.0%	306.14	428.60	40.0%	210.30	294.42	40.0%	234.26	327.96	40.0%	258.22	361.50	40.0%
57	264.88	370.84	40.0%	292.16	409.02	40.0%	319.44	447.22	40.0%	224.96	314.94	40.0%	249.56	349.38	40.0%	274.18	383.86	40.0%
58	280.86	393.20	40.0%	309.48	433.28	40.0%	338.08	473.32	40.0%	236.92	331.68	40.0%	262.22	367.10	40.0%	287.50	402.50	40.0%
59	295.48	413.68	40.0%	324.76	454.66	40.0%	354.04	495.66	40.0%	251.58	352.22	40.0%	277.54	388.56	40.0%	303.46	424.84	40.0%
60	307.48	430.48	40.0%	337.42	472.38	40.0%	367.36	514.30	40.0%	263.54	368.96	40.0%	290.16	406.22	40.0%	316.78	443.50	40.0%
61	322.10	450.94	40.0%	352.72	493.80	40.0%	383.32	536.64	40.0%	278.20	389.48	40.0%	305.48	427.68	40.0%	332.76	465.86	40.0%
62	334.10	467.74	40.0%	365.38	511.54	40.0%	396.64	555.30	40.0%	294.16	411.82	40.0%	322.78	451.90	40.0%	351.38	491.94	40.0%
63	348.72	488.20	40.0%	380.66	532.92	40.0%	412.62	577.66	40.0%	306.14	428.60	40.0%	335.42	469.58	40.0%	364.70	510.58	40.0%
64	363.38	508.74	40.0%	395.98	554.38	40.0%	428.58	600.02	40.0%	320.78	449.10	40.0%	350.72	491.00	40.0%	380.66	532.92	40.0%
65	379.34	531.08	40.0%	413.30	578.62	40.0%	447.22	626.10	40.0%	334.10	467.74	40.0%	365.38	511.54	40.0%	396.64	555.30	40.0%
66	431.24	603.74	40.0%	467.20	654.08	40.0%	503.12	704.36	40.0%	376.68	527.36	40.0%	410.64	574.90	40.0%	444.56	622.38	40.0%
67	484.48	678.28	40.0%	523.10	732.34	40.0%	561.68	786.36	40.0%	417.94	585.12	40.0%	453.88	635.44	40.0%	489.80	685.72	40.0%
68	533.74	747.24	40.0%	574.34	804.08	40.0%	614.92	860.88	40.0%	460.52	644.72	40.0%	499.14	698.80	40.0%	537.72	752.80	40.0%
69	590.96	827.34	40.0%	634.90	888.86	40.0%	678.82	950.34	40.0%	501.80	702.52	40.0%	542.38	759.34	40.0%	582.98	816.18	40.0%
70	642.88	900.04	40.0%	688.80	964.32	40.0%	734.72	999.98	36.1%	540.38	756.54	40.0%	582.98	816.18	40.0%	625.58	875.82	40.0%
71	692.12	968.96	40.0%	740.04	999.98	35.1%	787.96	999.98	26.9%	582.98	816.18	40.0%	628.24	879.54	40.0%	673.48	942.88	40.0%
72	749.36	999.98	33.4%	800.60	999.98	24.9%	851.84	999.98	17.4%	624.26	873.96	40.0%	671.50	940.10	40.0%	718.74	999.98	39.1%
73	799.94	999.98	25.0%	853.84	999.98	17.1%	907.74	999.98	10.2%	666.84	933.58	40.0%	716.76	999.98	39.5%	766.66	999.98	30.4%
74	851.84	999.98	17.4%	907.74	999.98	10.2%	963.64	999.98	3.8%	708.10	991.34	40.0%	760.02	999.98	31.6%	811.92	999.98	23.2%
75	909.08	999.98	10.0%	968.30	999.98	3.3%	999.98	999.98	0.0%	754.68	999.98	32.5%	809.94	999.98	23.5%	865.16	999.98	15.6%
76	968.96	999.98	3.2%	999.98	999.98	0.0%	999.98	999.98	0.0%	803.92	999.98	24.4%	865.16	999.98	15.6%	926.38	999.98	7.9%
77	999.98	999.98	0.0%	999.98	999.98	0.0%	999.98	999.98	0.0%	855.84	999.98	16.8%	923.06	999.98	8.3%	990.26	999.98	1.0%
78	999.98	999.98	0.0%	999.98	999.98	0.0%	999.98	999.98	0.0%	907.74	999.98	10.2%	980.96	999.98	1.9%	999.98	999.98	0.0%
79	999.98	999.98	0.0%	999.98	999.98	0.0%	999.98	999.98	0.0%	960.98	999.98	4.1%	999.98	999.98	0.0%	999.98	999.98	0.0%

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD																		
No Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
41	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
42	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
43	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
44	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
45	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
46	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
47	62.56	87.58	40.0%	72.56	101.58	40.0%	82.52	115.52	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
48	62.56	87.58	40.0%	72.56	101.58	40.0%	82.52	115.52	40.0%	54.58	76.42	40.0%	63.22	88.50	40.0%	71.88	100.64	40.0%
49	63.88	89.44	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	54.58	76.42	40.0%	63.22	88.50	40.0%	71.88	100.64	40.0%
50	66.56	93.18	40.0%	77.20	108.08	40.0%	87.84	122.98	40.0%	58.56	81.98	40.0%	67.90	95.06	40.0%	77.20	108.08	40.0%
51	67.90	95.06	40.0%	79.20	110.88	40.0%	90.50	126.70	40.0%	58.56	81.98	40.0%	67.90	95.06	40.0%	77.20	108.08	40.0%
52	67.90	95.06	40.0%	79.20	110.88	40.0%	90.50	126.70	40.0%	58.56	81.98	40.0%	67.90	95.06	40.0%	77.20	108.08	40.0%
53	69.22	96.90	40.0%	81.20	113.68	40.0%	93.18	130.46	40.0%	59.90	83.86	40.0%	69.90	97.86	40.0%	79.86	111.80	40.0%
54	69.22	96.90	40.0%	81.20	113.68	40.0%	93.18	130.46	40.0%	59.90	83.86	40.0%	69.90	97.86	40.0%	79.86	111.80	40.0%
55	74.54	104.36	40.0%	87.84	122.98	40.0%	101.16	141.62	40.0%	63.88	89.44	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%
56	79.86	111.80	40.0%	93.18	130.46	40.0%	106.48	149.08	40.0%	66.56	93.18	40.0%	77.20	108.08	40.0%	87.84	122.98	40.0%
57	86.52	121.12	40.0%	100.50	140.70	40.0%	114.46	160.24	40.0%	70.56	98.78	40.0%	81.86	114.60	40.0%	93.18	130.46	40.0%
58	93.18	130.46	40.0%	107.82	150.94	40.0%	122.46	171.44	40.0%	77.20	108.08	40.0%	89.18	124.86	40.0%	101.16	141.62	40.0%
59	97.18	136.06	40.0%	112.48	157.48	40.0%	127.78	178.90	40.0%	85.18	119.26	40.0%	98.50	137.90	40.0%	111.80	156.52	40.0%
60	106.48	149.08	40.0%	122.46	171.44	40.0%	138.42	193.78	40.0%	89.18	124.86	40.0%	103.16	144.42	40.0%	117.12	163.96	40.0%
61	111.80	156.52	40.0%	127.78	178.90	40.0%	143.74	201.24	40.0%	91.86	128.60	40.0%	105.82	148.14	40.0%	119.80	167.72	40.0%
62	115.80	162.12	40.0%	132.44	185.42	40.0%	149.08	208.72	40.0%	98.50	137.90	40.0%	113.14	158.40	40.0%	127.78	178.90	40.0%
63	122.46	171.44	40.0%	139.76	195.66	40.0%	157.06	219.88	40.0%	105.16	147.22	40.0%	120.48	168.68	40.0%	135.76	190.06	40.0%
64	133.10	186.34	40.0%	151.74	212.44	40.0%	170.36	238.50	40.0%	109.14	152.80	40.0%	125.12	175.16	40.0%	141.08	197.52	40.0%
65	139.76	195.66	40.0%	159.06	222.68	40.0%	178.36	249.70	40.0%	115.80	162.12	40.0%	132.44	185.42	40.0%	149.08	208.72	40.0%
66	161.06	225.48	40.0%	181.70	254.38	40.0%	202.32	283.24	40.0%	135.76	190.06	40.0%	154.40	216.16	40.0%	173.04	242.26	40.0%
67	185.02	259.02	40.0%	208.32	291.64	40.0%	231.60	324.24	40.0%	157.06	219.88	40.0%	177.04	247.86	40.0%	196.98	275.78	40.0%
68	206.32	288.84	40.0%	230.94	323.32	40.0%	255.56	357.78	40.0%	173.04	242.26	40.0%	194.32	272.04	40.0%	215.62	301.86	40.0%
69	228.94	320.52	40.0%	255.56	357.78	40.0%	282.18	395.06	40.0%	196.98	275.78	40.0%	220.94	309.32	40.0%	244.90	342.86	40.0%
70	250.22	350.30	40.0%	279.52	391.32	40.0%	308.80	432.32	40.0%	218.28	305.60	40.0%	243.58	341.02	40.0%	268.86	376.40	40.0%
71	271.52	380.12	40.0%	302.14	423.00	40.0%	332.76	465.86	40.0%	236.92	331.68	40.0%	263.54	368.96	40.0%	290.16	406.22	40.0%
72	294.16	411.82	40.0%	326.76	457.46	40.0%	359.38	503.14	40.0%	260.88	365.24	40.0%	290.16	406.22	40.0%	319.44	447.22	40.0%
73	316.78	443.50	40.0%	351.38	491.94	40.0%	386.00	540.40	40.0%	279.52	391.32	40.0%	310.14	434.20	40.0%	340.74	477.04	40.0%
74	339.42	475.18	40.0%	376.02	526.42	40.0%	412.62	577.66	40.0%	300.80	421.12	40.0%	332.76	465.86	40.0%	364.70	510.58	40.0%
75	366.04	512.46	40.0%	405.30	567.42	40.0%	444.56	622.38	40.0%	322.10	450.94	40.0%	356.70	499.38	40.0%	391.32	547.84	40.0%
76	411.30	575.82	40.0%	453.22	634.50	40.0%	495.14	693.20	40.0%	367.36	514.30	40.0%	404.62	566.46	40.0%	441.90	618.66	40.0%
77	457.86	641.00	40.0%	503.12	704.36	40.0%	548.38	767.74	40.0%	413.96	579.54	40.0%	454.54	636.36	40.0%	495.14	693.20	40.0%
78	503.12	704.36	40.0%	551.04	771.46	40.0%	598.96	838.54	40.0%	460.52	644.72	40.0%	504.46	706.24	40.0%	548.38	767.74	40.0%
79	553.70	775.18	40.0%	605.62	847.86	40.0%	657.52	920.52	40.0%	509.78	713.70	40.0%	557.04	779.86	40.0%	604.28	846.00	40.0%

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD																		
Simple Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
41	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
42	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
43	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
44	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
45	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
46	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
47	93.18	130.46	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	77.20	108.08	40.0%	87.84	122.98	40.0%	98.50	137.90	40.0%
48	97.18	136.06	40.0%	111.14	155.60	40.0%	125.12	175.16	40.0%	81.20	113.68	40.0%	92.52	129.52	40.0%	103.82	145.34	40.0%
49	102.50	143.50	40.0%	116.46	163.04	40.0%	130.44	182.62	40.0%	83.86	117.40	40.0%	95.18	133.26	40.0%	106.48	149.08	40.0%
50	106.48	149.08	40.0%	121.14	169.60	40.0%	135.76	190.06	40.0%	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%
51	110.48	154.68	40.0%	125.80	176.12	40.0%	141.08	197.52	40.0%	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%
52	113.14	158.40	40.0%	128.46	179.84	40.0%	143.74	201.24	40.0%	90.50	126.70	40.0%	102.50	143.50	40.0%	114.46	160.24	40.0%
53	117.12	163.96	40.0%	133.10	186.34	40.0%	149.08	208.72	40.0%	95.84	134.18	40.0%	109.14	152.80	40.0%	122.46	171.44	40.0%
54	121.14	169.60	40.0%	137.76	192.86	40.0%	154.40	216.16	40.0%	101.16	141.62	40.0%	114.46	160.24	40.0%	127.78	178.90	40.0%
55	127.78	178.90	40.0%	145.10	203.14	40.0%	162.38	227.34	40.0%	105.16	147.22	40.0%	119.14	166.80	40.0%	133.10	186.34	40.0%
56	135.76	190.06	40.0%	154.40	216.16	40.0%	173.04	242.26	40.0%	111.80	156.52	40.0%	126.46	177.04	40.0%	141.08	197.52	40.0%
57	142.42	199.38	40.0%	161.72	226.40	40.0%	181.02	253.42	40.0%	118.48	165.88	40.0%	133.78	187.30	40.0%	149.08	208.72	40.0%
58	154.40	216.16	40.0%	174.38	244.14	40.0%	194.32	272.04	40.0%	130.44	182.62	40.0%	146.42	204.98	40.0%	162.38	227.34	40.0%
59	161.06	225.48	40.0%	181.70	254.38	40.0%	202.32	283.24	40.0%	137.10	191.94	40.0%	153.74	215.24	40.0%	170.36	238.50	40.0%
60	170.36	238.50	40.0%	191.66	268.32	40.0%	212.96	298.14	40.0%	149.08	208.72	40.0%	166.38	232.94	40.0%	183.68	257.16	40.0%
61	179.70	251.58	40.0%	201.66	282.32	40.0%	223.60	313.04	40.0%	157.06	219.88	40.0%	175.70	245.98	40.0%	194.32	272.04	40.0%
62	187.68	262.76	40.0%	210.98	295.38	40.0%	234.26	327.96	40.0%	163.72	229.20	40.0%	183.02	256.22	40.0%	202.32	283.24	40.0%
63	196.98	275.78	40.0%	220.94	309.32	40.0%	244.90	342.86	40.0%	175.70	245.98	40.0%	195.66	273.92	40.0%	215.62	301.86	40.0%
64	206.32	288.84	40.0%	230.94	323.32	40.0%	255.56	357.78	40.0%	182.36	255.30	40.0%	203.00	284.20	40.0%	223.60	313.04	40.0%
65	216.96	303.74	40.0%	242.92	340.08	40.0%	268.86	376.40	40.0%	193.00	270.20	40.0%	214.96	300.94	40.0%	236.92	331.68	40.0%
66	246.24	344.74	40.0%	274.86	384.80	40.0%	303.46	424.84	40.0%	223.60	313.04	40.0%	247.56	346.58	40.0%	271.52	380.12	40.0%
67	279.52	391.32	40.0%	310.14	434.20	40.0%	340.74	477.04	40.0%	254.24	355.94	40.0%	280.20	392.28	40.0%	306.14	428.60	40.0%
68	310.14	434.20	40.0%	342.74	479.84	40.0%	375.34	525.48	40.0%	283.52	396.92	40.0%	312.14	437.00	40.0%	340.74	477.04	40.0%
69	339.42	475.18	40.0%	374.68	524.56	40.0%	409.94	573.92	40.0%	312.80	437.92	40.0%	342.74	479.84	40.0%	372.68	521.76	40.0%
70	372.68	521.76	40.0%	409.94	573.92	40.0%	447.22	626.10	40.0%	343.40	480.76	40.0%	375.34	525.48	40.0%	407.28	570.20	40.0%
71	404.62	566.46	40.0%	444.56	622.38	40.0%	484.48	678.28	40.0%	375.34	525.48	40.0%	409.94	573.92	40.0%	444.56	622.38	40.0%
72	432.58	605.62	40.0%	474.52	664.32	40.0%	516.42	722.98	40.0%	401.96	562.74	40.0%	437.92	613.08	40.0%	473.84	663.38	40.0%
73	464.54	650.36	40.0%	509.12	712.76	40.0%	553.70	775.18	40.0%	436.56	611.18	40.0%	475.18	665.26	40.0%	513.76	719.26	40.0%
74	497.80	696.92	40.0%	544.40	762.16	40.0%	590.96	827.34	40.0%	464.54	650.36	40.0%	505.12	707.16	40.0%	545.72	764.00	40.0%
75	531.08	743.52	40.0%	581.00	813.40	40.0%	630.90	883.26	40.0%	495.14	693.20	40.0%	537.72	752.80	40.0%	580.32	812.44	40.0%
76	592.30	829.22	40.0%	646.20	904.68	40.0%	700.10	980.14	40.0%	556.36	778.90	40.0%	602.96	844.14	40.0%	649.52	909.32	40.0%
77	652.20	913.08	40.0%	709.44	993.22	40.0%	766.66	999.98	30.4%	617.58	864.62	40.0%	668.16	935.42	40.0%	718.74	999.98	39.1%
78	717.42	999.98	39.4%	779.30	999.98	28.3%	841.20	999.98	18.9%	682.82	955.94	40.0%	738.06	999.98	35.5%	793.28	999.98	26.1%
79	781.30	999.98	28.0%	847.20	999.98	18.0%	913.06	999.98	9.5%	746.70	999.98	33.9%	805.92	999.98	24.1%	865.16	999.98	15.6%

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD																		
Compound Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	133.10	186.34	40.0%
41	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	133.10	186.34	40.0%
42	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	133.10	186.34	40.0%
43	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	133.10	186.34	40.0%
44	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	133.10	186.34	40.0%
45	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	133.10	186.34	40.0%
46	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%	109.14	152.80	40.0%	122.46	171.44	40.0%	135.76	190.06	40.0%
47	131.78	184.50	40.0%	148.42	207.78	40.0%	165.04	231.06	40.0%	113.14	158.40	40.0%	127.12	177.96	40.0%	141.08	197.52	40.0%
48	134.44	188.22	40.0%	151.08	211.52	40.0%	167.70	234.78	40.0%	115.80	162.12	40.0%	129.78	181.70	40.0%	143.74	201.24	40.0%
49	138.42	193.78	40.0%	155.74	218.04	40.0%	173.04	242.26	40.0%	122.46	171.44	40.0%	137.10	191.94	40.0%	151.74	212.44	40.0%
50	141.08	197.52	40.0%	158.40	221.76	40.0%	175.70	245.98	40.0%	129.12	180.76	40.0%	144.44	202.22	40.0%	159.72	223.60	40.0%
51	146.42	204.98	40.0%	165.04	231.06	40.0%	183.68	257.16	40.0%	131.78	184.50	40.0%	147.10	205.94	40.0%	162.38	227.34	40.0%
52	151.74	212.44	40.0%	170.36	238.50	40.0%	189.00	264.60	40.0%	135.76	190.06	40.0%	151.74	212.44	40.0%	167.70	234.78	40.0%
53	155.74	218.04	40.0%	175.04	245.06	40.0%	194.32	272.04	40.0%	138.42	193.78	40.0%	154.40	216.16	40.0%	170.36	238.50	40.0%
54	158.40	221.76	40.0%	177.70	248.78	40.0%	196.98	275.78	40.0%	142.42	199.38	40.0%	159.06	222.68	40.0%	175.70	245.98	40.0%
55	162.38	227.34	40.0%	182.36	255.30	40.0%	202.32	283.24	40.0%	151.74	212.44	40.0%	169.04	236.66	40.0%	186.34	260.88	40.0%
56	171.72	240.40	40.0%	192.34	269.28	40.0%	212.96	298.14	40.0%	159.72	223.60	40.0%	178.36	249.70	40.0%	196.98	275.78	40.0%
57	183.68	257.16	40.0%	204.98	286.98	40.0%	226.28	316.80	40.0%	169.04	236.66	40.0%	188.34	263.68	40.0%	207.64	290.70	40.0%
58	198.34	277.68	40.0%	220.28	308.40	40.0%	242.24	339.14	40.0%	181.02	253.42	40.0%	201.00	281.40	40.0%	220.94	309.32	40.0%
59	208.98	292.58	40.0%	232.28	325.20	40.0%	255.56	357.78	40.0%	190.34	266.48	40.0%	210.98	295.38	40.0%	231.60	324.24	40.0%
60	223.60	313.04	40.0%	247.56	346.58	40.0%	271.52	380.12	40.0%	202.32	283.24	40.0%	223.60	313.04	40.0%	244.90	342.86	40.0%
61	232.94	326.12	40.0%	257.56	360.58	40.0%	282.18	395.06	40.0%	211.64	296.30	40.0%	233.60	327.04	40.0%	255.56	357.78	40.0%
62	242.24	339.14	40.0%	267.54	374.56	40.0%	292.82	409.94	40.0%	224.96	314.94	40.0%	248.24	347.54	40.0%	271.52	380.12	40.0%
63	256.90	359.66	40.0%	282.86	396.00	40.0%	308.80	432.32	40.0%	234.26	327.96	40.0%	258.22	361.50	40.0%	282.18	395.06	40.0%
64	268.86	376.40	40.0%	295.48	413.68	40.0%	322.10	450.94	40.0%	246.24	344.74	40.0%	270.86	379.20	40.0%	295.48	413.68	40.0%
65	283.52	396.92	40.0%	312.14	437.00	40.0%	340.74	477.04	40.0%	255.56	357.78	40.0%	280.86	393.20	40.0%	306.14	428.60	40.0%
66	322.10	450.94	40.0%	352.72	493.80	40.0%	383.32	536.64	40.0%	283.52	396.92	40.0%	310.80	435.12	40.0%	338.08	473.32	40.0%
67	360.72	505.00	40.0%	394.66	552.52	40.0%	428.58	600.02	40.0%	314.12	439.76	40.0%	344.74	482.64	40.0%	375.34	525.48	40.0%
68	399.30	559.02	40.0%	435.24	609.34	40.0%	471.18	659.66	40.0%	347.40	486.36	40.0%	380.00	532.00	40.0%	412.62	577.66	40.0%
69	440.58	616.82	40.0%	479.84	671.78	40.0%	519.10	726.74	40.0%	378.00	529.20	40.0%	413.96	579.54	40.0%	449.88	629.84	40.0%
70	476.50	667.10	40.0%	517.78	724.90	40.0%	559.02	782.62	40.0%	411.30	575.82	40.0%	450.56	630.78	40.0%	489.80	685.72	40.0%
71	517.78	724.90	40.0%	562.36	787.30	40.0%	606.94	849.72	40.0%	441.90	618.66	40.0%	483.16	676.42	40.0%	524.42	734.18	40.0%
72	556.36	778.90	40.0%	602.96	844.14	40.0%	649.52	909.32	40.0%	472.52	661.52	40.0%	517.12	723.96	40.0%	561.68	786.36	40.0%
73	594.96	832.94	40.0%	644.88	902.84	40.0%	694.78	972.70	40.0%	503.12	704.36	40.0%	549.72	769.60	40.0%	596.28	834.80	40.0%
74	633.56	886.98	40.0%	685.48	959.68	40.0%	737.38	999.98	35.6%	533.74	747.24	40.0%	583.66	817.12	40.0%	633.56	886.98	40.0%
75	677.50	948.50	40.0%	732.74	999.98	36.5%	787.96	999.98	26.9%	568.34	795.68	40.0%	620.92	869.28	40.0%	673.48	942.88	40.0%
76	740.04	999.98	35.1%	799.94	999.98	25.0%	859.82	999.98	16.3%	630.90	883.26	40.0%	688.14	963.40	40.0%	745.36	999.98	34.2%
77	805.26	999.98	24.2%	869.82	999.98	15.0%	934.36	999.98	7.0%	696.12	974.56	40.0%	758.02	999.98	31.9%	819.90	999.98	22.0%
78	870.48	999.98	14.9%	939.68	999.98	6.4%	999.98	999.98	0.0%	761.34	999.98	31.3%	827.88	999.98	20.8%	894.44	999.98	11.8%
79	934.36	999.98	7.0%	999.98	999.98	0.0%	999.98	999.98	0.0%	823.90	999.98	21.4%	895.12	999.98	11.7%	966.30	999.98	3.5%

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD																		
No Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
41	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
42	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
43	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
44	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
45	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
46	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
47	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%
48	51.92	72.68	40.0%	60.56	84.78	40.0%	69.22	96.90	40.0%	37.26	52.16	40.0%	43.94	61.52	40.0%	50.58	70.82	40.0%
49	54.58	76.42	40.0%	63.22	88.50	40.0%	71.88	100.64	40.0%	39.94	55.92	40.0%	46.60	65.24	40.0%	53.24	74.54	40.0%
50	55.90	78.26	40.0%	65.24	91.34	40.0%	74.54	104.36	40.0%	42.60	59.64	40.0%	50.58	70.82	40.0%	58.56	81.98	40.0%
51	55.90	78.26	40.0%	65.24	91.34	40.0%	74.54	104.36	40.0%	42.60	59.64	40.0%	50.58	70.82	40.0%	58.56	81.98	40.0%
52	58.56	81.98	40.0%	67.90	95.06	40.0%	77.20	108.08	40.0%	47.92	67.08	40.0%	55.90	78.26	40.0%	63.88	89.44	40.0%
53	59.90	83.86	40.0%	69.90	97.86	40.0%	79.86	111.80	40.0%	49.26	68.96	40.0%	57.90	81.06	40.0%	66.56	93.18	40.0%
54	59.90	83.86	40.0%	69.90	97.86	40.0%	79.86	111.80	40.0%	49.26	68.96	40.0%	57.90	81.06	40.0%	66.56	93.18	40.0%
55	63.88	89.44	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	53.24	74.54	40.0%	62.56	87.58	40.0%	71.88	100.64	40.0%
56	66.56	93.18	40.0%	77.20	108.08	40.0%	87.84	122.98	40.0%	55.90	78.26	40.0%	65.24	91.34	40.0%	74.54	104.36	40.0%
57	70.56	98.78	40.0%	81.86	114.60	40.0%	93.18	130.46	40.0%	59.90	83.86	40.0%	69.90	97.86	40.0%	79.86	111.80	40.0%
58	77.20	108.08	40.0%	89.18	124.86	40.0%	101.16	141.62	40.0%	63.88	89.44	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%
59	85.18	119.26	40.0%	98.50	137.90	40.0%	111.80	156.52	40.0%	67.90	95.06	40.0%	79.20	110.88	40.0%	90.50	126.70	40.0%
60	89.18	124.86	40.0%	103.16	144.42	40.0%	117.12	163.96	40.0%	77.20	108.08	40.0%	89.18	124.86	40.0%	101.16	141.62	40.0%
61	93.18	130.46	40.0%	107.82	150.94	40.0%	122.46	171.44	40.0%	79.86	111.80	40.0%	91.86	128.60	40.0%	103.82	145.34	40.0%
62	99.84	139.78	40.0%	115.14	161.20	40.0%	130.44	182.62	40.0%	85.18	119.26	40.0%	98.50	137.90	40.0%	111.80	156.52	40.0%
63	106.48	149.08	40.0%	122.46	171.44	40.0%	138.42	193.78	40.0%	89.18	124.86	40.0%	103.16	144.42	40.0%	117.12	163.96	40.0%
64	110.48	154.68	40.0%	127.12	177.96	40.0%	143.74	201.24	40.0%	93.18	130.46	40.0%	107.82	150.94	40.0%	122.46	171.44	40.0%
65	117.12	163.96	40.0%	134.44	188.22	40.0%	151.74	212.44	40.0%	99.84	139.78	40.0%	115.14	161.20	40.0%	130.44	182.62	40.0%
66	137.10	191.94	40.0%	156.40	218.96	40.0%	175.70	245.98	40.0%	115.80	162.12	40.0%	132.44	185.42	40.0%	149.08	208.72	40.0%
67	157.06	219.88	40.0%	178.36	249.70	40.0%	199.66	279.52	40.0%	135.76	190.06	40.0%	154.40	216.16	40.0%	173.04	242.26	40.0%
68	174.38	244.14	40.0%	197.68	276.76	40.0%	220.94	309.32	40.0%	154.40	216.16	40.0%	174.38	244.14	40.0%	194.32	272.04	40.0%
69	194.32	272.04	40.0%	219.62	307.46	40.0%	244.90	342.86	40.0%	167.70	234.78	40.0%	189.00	264.60	40.0%	210.30	294.42	40.0%
70	214.30	300.02	40.0%	241.58	338.22	40.0%	268.86	376.40	40.0%	189.00	264.60	40.0%	212.96	298.14	40.0%	236.92	331.68	40.0%
71	234.26	327.96	40.0%	263.54	368.96	40.0%	292.82	409.94	40.0%	207.64	290.70	40.0%	232.94	326.12	40.0%	258.22	361.50	40.0%
72	251.58	352.22	40.0%	282.86	396.00	40.0%	314.12	439.76	40.0%	220.94	309.32	40.0%	247.56	346.58	40.0%	274.18	383.86	40.0%
73	270.20	378.28	40.0%	302.80	423.92	40.0%	335.42	469.58	40.0%	240.92	337.28	40.0%	269.54	377.36	40.0%	298.14	417.40	40.0%
74	291.50	408.10	40.0%	326.76	457.46	40.0%	362.04	506.86	40.0%	259.56	363.38	40.0%	289.50	405.30	40.0%	319.44	447.22	40.0%
75	314.12	439.76	40.0%	351.38	491.94	40.0%	388.66	544.12	40.0%	279.52	391.32	40.0%	311.46	436.04	40.0%	343.40	480.76	40.0%
76	358.06	501.28	40.0%	398.64	558.10	40.0%	439.24	614.94	40.0%	320.78	449.10	40.0%	356.04	498.46	40.0%	391.32	547.84	40.0%
77	399.30	559.02	40.0%	443.24	620.54	40.0%	487.14	682.00	40.0%	364.70	510.58	40.0%	403.30	564.62	40.0%	441.90	618.66	40.0%
78	444.56	622.38	40.0%	491.16	687.62	40.0%	537.72	752.80	40.0%	409.94	573.92	40.0%	451.22	631.70	40.0%	492.48	689.48	40.0%
79	489.80	685.72	40.0%	540.38	756.54	40.0%	590.96	827.34	40.0%	455.20	637.28	40.0%	500.46	700.64	40.0%	545.72	764.00	40.0%
80										500.46	700.64	40.0%	548.38	767.74	40.0%			
81										544.40	762.16	40.0%	595.62	833.86	40.0%			
82										592.30	829.22	40.0%	647.54	906.56	40.0%			
83										640.22	896.30	40.0%	699.44	979.22	40.0%			
84										684.14	957.80	40.0%	746.70	999.98	33.9%			

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD																		
Simple Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
41	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
42	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
43	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
44	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
45	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
46	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
47	77.20	108.08	40.0%	87.84	122.98	40.0%	98.50	137.90	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
48	78.54	109.96	40.0%	89.84	125.78	40.0%	101.16	141.62	40.0%	63.88	89.44	40.0%	73.22	102.50	40.0%	82.52	115.52	40.0%
49	81.20	113.68	40.0%	92.52	129.52	40.0%	103.82	145.34	40.0%	65.24	91.34	40.0%	75.22	105.30	40.0%	85.18	119.26	40.0%
50	85.18	119.26	40.0%	97.18	136.06	40.0%	109.14	152.80	40.0%	67.90	95.06	40.0%	77.88	109.04	40.0%	87.84	122.98	40.0%
51	85.18	119.26	40.0%	97.18	136.06	40.0%	109.14	152.80	40.0%	67.90	95.06	40.0%	77.88	109.04	40.0%	87.84	122.98	40.0%
52	87.84	122.98	40.0%	99.84	139.78	40.0%	111.80	156.52	40.0%	69.22	96.90	40.0%	79.86	111.80	40.0%	90.50	126.70	40.0%
53	90.50	126.70	40.0%	103.82	145.34	40.0%	117.12	163.96	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
54	93.18	130.46	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%
55	97.18	136.06	40.0%	111.14	155.60	40.0%	125.12	175.16	40.0%	78.54	109.96	40.0%	89.84	125.78	40.0%	101.16	141.62	40.0%
56	106.48	149.08	40.0%	121.14	169.60	40.0%	135.76	190.06	40.0%	85.18	119.26	40.0%	97.18	136.06	40.0%	109.14	152.80	40.0%
57	113.14	158.40	40.0%	128.46	179.84	40.0%	143.74	201.24	40.0%	93.18	130.46	40.0%	106.48	149.08	40.0%	119.80	167.72	40.0%
58	119.80	167.72	40.0%	135.76	190.06	40.0%	151.74	212.44	40.0%	102.50	143.50	40.0%	116.46	163.04	40.0%	130.44	182.62	40.0%
59	129.12	180.76	40.0%	145.76	204.06	40.0%	162.38	227.34	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
60	138.42	193.78	40.0%	157.06	219.88	40.0%	175.70	245.98	40.0%	119.80	167.72	40.0%	135.76	190.06	40.0%	151.74	212.44	40.0%
61	145.10	203.14	40.0%	164.38	230.14	40.0%	183.68	257.16	40.0%	129.12	180.76	40.0%	145.76	204.06	40.0%	162.38	227.34	40.0%
62	154.40	216.16	40.0%	174.38	244.14	40.0%	194.32	272.04	40.0%	135.76	190.06	40.0%	153.08	214.32	40.0%	170.36	238.50	40.0%
63	161.06	225.48	40.0%	181.70	254.38	40.0%	202.32	283.24	40.0%	143.74	201.24	40.0%	162.38	227.34	40.0%	181.02	253.42	40.0%
64	167.70	234.78	40.0%	189.00	264.60	40.0%	210.30	294.42	40.0%	153.08	214.32	40.0%	172.38	241.34	40.0%	191.66	268.32	40.0%
65	182.36	255.30	40.0%	205.66	287.92	40.0%	228.94	320.52	40.0%	163.72	229.20	40.0%	184.36	258.10	40.0%	204.98	286.98	40.0%
66	206.32	288.84	40.0%	230.94	323.32	40.0%	255.56	357.78	40.0%	185.02	259.02	40.0%	206.98	289.78	40.0%	228.94	320.52	40.0%
67	231.60	324.24	40.0%	258.22	361.50	40.0%	284.84	398.78	40.0%	211.64	296.30	40.0%	236.26	330.76	40.0%	260.88	365.24	40.0%
68	260.88	365.24	40.0%	290.16	406.22	40.0%	319.44	447.22	40.0%	235.60	329.84	40.0%	261.56	366.18	40.0%	287.50	402.50	40.0%
69	286.18	400.66	40.0%	317.46	444.44	40.0%	348.72	488.20	40.0%	259.56	363.38	40.0%	288.18	403.46	40.0%	316.78	443.50	40.0%
70	315.46	441.64	40.0%	349.40	489.16	40.0%	383.32	536.64	40.0%	284.84	398.78	40.0%	315.46	441.64	40.0%	346.06	484.48	40.0%
71	340.74	477.04	40.0%	376.68	527.36	40.0%	412.62	577.66	40.0%	308.80	432.32	40.0%	340.74	477.04	40.0%	372.68	521.76	40.0%
72	367.36	514.30	40.0%	405.96	568.34	40.0%	444.56	622.38	40.0%	332.76	465.86	40.0%	367.36	514.30	40.0%	401.96	562.74	40.0%
73	395.32	553.44	40.0%	435.90	610.26	40.0%	476.50	667.10	40.0%	356.70	499.38	40.0%	392.66	549.72	40.0%	428.58	600.02	40.0%
74	423.26	592.56	40.0%	465.86	652.20	40.0%	508.44	711.82	40.0%	383.32	536.64	40.0%	421.94	590.72	40.0%	460.52	644.72	40.0%
75	452.54	633.56	40.0%	497.80	696.92	40.0%	543.04	760.26	40.0%	408.62	572.06	40.0%	449.22	628.90	40.0%	489.80	685.72	40.0%
76	500.46	700.64	40.0%	549.72	769.60	40.0%	598.96	838.54	40.0%	456.54	639.16	40.0%	501.14	701.60	40.0%	545.72	764.00	40.0%
77	549.72	769.60	40.0%	602.30	843.22	40.0%	654.86	916.80	40.0%	505.78	708.10	40.0%	553.70	775.18	40.0%	601.62	842.26	40.0%
78	601.62	842.26	40.0%	658.86	922.40	40.0%	716.08	999.98	39.6%	557.70	780.78	40.0%	610.28	854.40	40.0%	662.84	927.98	40.0%
79	652.20	913.08	40.0%	713.42	998.78	40.0%	774.64	999.98	29.1%	608.28	851.60	40.0%	664.84	930.78	40.0%	721.40	999.98	38.6%
80										660.18	924.26	40.0%	721.40	999.98	38.6%			
81										713.42	998.78	40.0%	778.64	999.98	28.4%			
82										765.34	999.98	30.7%	835.20	999.98	19.7%			
83										817.24	999.98	22.4%	891.78	999.98	12.1%			
84										867.82	999.98	15.2%	946.36	999.98	5.7%			

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD																		
Compound Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
41	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
42	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
43	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
44	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
45	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
46	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
47	119.80	167.72	40.0%	133.10	186.34	40.0%	146.42	204.98	40.0%	101.16	141.62	40.0%	111.80	156.52	40.0%	122.46	171.44	40.0%
48	121.14	169.60	40.0%	135.10	189.14	40.0%	149.08	208.72	40.0%	105.16	147.22	40.0%	116.46	163.04	40.0%	127.78	178.90	40.0%
49	123.80	173.32	40.0%	137.76	192.86	40.0%	151.74	212.44	40.0%	105.16	147.22	40.0%	116.46	163.04	40.0%	127.78	178.90	40.0%
50	127.78	178.90	40.0%	142.42	199.38	40.0%	157.06	219.88	40.0%	109.14	152.80	40.0%	121.14	169.60	40.0%	133.10	186.34	40.0%
51	127.78	178.90	40.0%	142.42	199.38	40.0%	157.06	219.88	40.0%	109.14	152.80	40.0%	121.14	169.60	40.0%	133.10	186.34	40.0%
52	130.44	182.62	40.0%	145.10	203.14	40.0%	159.72	223.60	40.0%	109.14	152.80	40.0%	121.14	169.60	40.0%	133.10	186.34	40.0%
53	131.78	184.50	40.0%	147.10	205.94	40.0%	162.38	227.34	40.0%	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%
54	134.44	188.22	40.0%	149.76	209.66	40.0%	165.04	231.06	40.0%	114.46	160.24	40.0%	127.78	178.90	40.0%	141.08	197.52	40.0%
55	138.42	193.78	40.0%	154.40	216.16	40.0%	170.36	238.50	40.0%	121.14	169.60	40.0%	135.10	189.14	40.0%	149.08	208.72	40.0%
56	147.76	206.86	40.0%	164.38	230.14	40.0%	181.02	253.42	40.0%	127.78	178.90	40.0%	142.42	199.38	40.0%	157.06	219.88	40.0%
57	154.40	216.16	40.0%	171.72	240.40	40.0%	189.00	264.60	40.0%	134.44	188.22	40.0%	149.76	209.66	40.0%	165.04	231.06	40.0%
58	166.38	232.94	40.0%	185.68	259.96	40.0%	204.98	286.98	40.0%	141.08	197.52	40.0%	157.06	219.88	40.0%	173.04	242.26	40.0%
59	175.70	245.98	40.0%	195.66	273.92	40.0%	215.62	301.86	40.0%	154.40	216.16	40.0%	171.72	240.40	40.0%	189.00	264.60	40.0%
60	186.34	260.88	40.0%	207.64	290.70	40.0%	228.94	320.52	40.0%	162.38	227.34	40.0%	181.02	253.42	40.0%	199.66	279.52	40.0%
61	193.00	270.20	40.0%	214.96	300.94	40.0%	236.92	331.68	40.0%	169.04	236.66	40.0%	188.34	263.68	40.0%	207.64	290.70	40.0%
62	203.66	285.12	40.0%	226.96	317.74	40.0%	250.22	350.30	40.0%	182.36	255.30	40.0%	203.00	284.20	40.0%	223.60	313.04	40.0%
63	214.30	300.02	40.0%	238.92	334.48	40.0%	263.54	368.96	40.0%	189.00	264.60	40.0%	210.30	294.42	40.0%	231.60	324.24	40.0%
64	220.94	309.32	40.0%	246.24	344.74	40.0%	271.52	380.12	40.0%	198.34	277.68	40.0%	220.28	308.40	40.0%	242.24	339.14	40.0%
65	234.26	327.96	40.0%	260.88	365.24	40.0%	287.50	402.50	40.0%	210.30	294.42	40.0%	234.26	327.96	40.0%	258.22	361.50	40.0%
66	263.54	368.96	40.0%	292.82	409.94	40.0%	322.10	450.94	40.0%	235.60	329.84	40.0%	261.56	366.18	40.0%	287.50	402.50	40.0%
67	294.16	411.82	40.0%	325.44	455.62	40.0%	356.70	499.38	40.0%	264.88	370.84	40.0%	293.50	410.90	40.0%	322.10	450.94	40.0%
68	328.76	460.26	40.0%	362.72	507.80	40.0%	396.64	555.30	40.0%	292.82	409.94	40.0%	323.44	452.82	40.0%	354.04	495.66	40.0%
69	360.72	505.00	40.0%	397.32	556.24	40.0%	433.90	607.46	40.0%	326.10	456.54	40.0%	360.06	504.08	40.0%	393.98	551.58	40.0%
70	392.66	549.72	40.0%	431.92	604.68	40.0%	471.18	659.66	40.0%	354.04	495.66	40.0%	390.00	546.00	40.0%	425.92	596.28	40.0%
71	423.26	592.56	40.0%	464.54	650.36	40.0%	505.78	708.10	40.0%	380.66	532.92	40.0%	419.28	587.00	40.0%	457.86	641.00	40.0%
72	456.54	639.16	40.0%	501.14	701.60	40.0%	545.72	764.00	40.0%	409.94	573.92	40.0%	451.22	631.70	40.0%	492.48	689.48	40.0%
73	487.14	682.00	40.0%	533.74	747.24	40.0%	580.32	812.44	40.0%	439.24	614.94	40.0%	483.16	676.42	40.0%	527.08	737.92	40.0%
74	521.76	730.46	40.0%	571.02	799.42	40.0%	620.24	868.34	40.0%	467.20	654.08	40.0%	513.10	718.34	40.0%	559.02	782.62	40.0%
75	553.70	775.18	40.0%	605.62	847.86	40.0%	657.52	920.52	40.0%	500.46	700.64	40.0%	549.72	769.60	40.0%	598.96	838.54	40.0%
76	602.96	844.14	40.0%	659.52	923.32	40.0%	716.08	999.98	39.6%	549.72	769.60	40.0%	603.62	845.06	40.0%	657.52	920.52	40.0%
77	652.20	913.08	40.0%	713.42	998.78	40.0%	774.64	999.98	29.1%	597.64	836.70	40.0%	655.54	917.76	40.0%	713.42	998.78	40.0%
78	704.12	985.76	40.0%	770.00	999.98	29.9%	835.86	999.98	19.6%	649.52	909.32	40.0%	712.10	996.94	40.0%	774.64	999.98	29.1%
79	753.34	999.98	32.7%	823.90	999.98	21.4%	894.44	999.98	11.8%	698.78	978.30	40.0%	766.00	999.98	30.5%	833.20	999.98	20.0%
80										750.68	999.98	33.2%	822.56	999.98	21.6%			
81										799.94	999.98	25.0%	876.48	999.98	14.1%			
82										851.84	999.98	17.4%	933.04	999.98	7.2%			
83										903.76	999.98	10.6%	989.60	999.98	1.0%			
84										955.66	999.98	4.6%	999.98	999.98	0.0%			

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD																		
No Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
41	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
42	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
43	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
44	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
45	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
46	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
47	35.94	50.32	40.0%	41.94	58.72	40.0%	47.92	67.08	40.0%	27.96	39.14	40.0%	32.62	45.66	40.0%	37.26	52.16	40.0%
48	37.26	52.16	40.0%	43.94	61.52	40.0%	50.58	70.82	40.0%	29.28	41.00	40.0%	34.60	48.44	40.0%	39.94	55.92	40.0%
49	37.26	52.16	40.0%	43.94	61.52	40.0%	50.58	70.82	40.0%	29.28	41.00	40.0%	34.60	48.44	40.0%	39.94	55.92	40.0%
50	42.60	59.64	40.0%	50.58	70.82	40.0%	58.56	81.98	40.0%	33.28	46.60	40.0%	39.28	55.00	40.0%	45.26	63.36	40.0%
51	42.60	59.64	40.0%	50.58	70.82	40.0%	58.56	81.98	40.0%	33.28	46.60	40.0%	39.28	55.00	40.0%	45.26	63.36	40.0%
52	42.60	59.64	40.0%	50.58	70.82	40.0%	58.56	81.98	40.0%	33.28	46.60	40.0%	39.28	55.00	40.0%	45.26	63.36	40.0%
53	43.94	61.52	40.0%	52.58	73.62	40.0%	61.22	85.70	40.0%	34.60	48.44	40.0%	41.28	57.80	40.0%	47.92	67.08	40.0%
54	43.94	61.52	40.0%	52.58	73.62	40.0%	61.22	85.70	40.0%	34.60	48.44	40.0%	41.28	57.80	40.0%	47.92	67.08	40.0%
55	50.58	70.82	40.0%	59.90	83.86	40.0%	69.22	96.90	40.0%	39.94	55.92	40.0%	47.92	67.08	40.0%	55.90	78.26	40.0%
56	53.24	74.54	40.0%	62.56	87.58	40.0%	71.88	100.64	40.0%	39.94	55.92	40.0%	47.92	67.08	40.0%	55.90	78.26	40.0%
57	57.24	80.14	40.0%	67.24	94.14	40.0%	77.20	108.08	40.0%	43.94	61.52	40.0%	52.58	73.62	40.0%	61.22	85.70	40.0%
58	61.22	85.70	40.0%	71.88	100.64	40.0%	82.52	115.52	40.0%	50.58	70.82	40.0%	59.90	83.86	40.0%	69.22	96.90	40.0%
59	65.24	91.34	40.0%	76.54	107.16	40.0%	87.84	122.98	40.0%	53.24	74.54	40.0%	62.56	87.58	40.0%	71.88	100.64	40.0%
60	71.88	100.64	40.0%	83.86	117.40	40.0%	95.84	134.18	40.0%	57.24	80.14	40.0%	67.24	94.14	40.0%	77.20	108.08	40.0%
61	77.20	108.08	40.0%	89.18	124.86	40.0%	101.16	141.62	40.0%	61.22	85.70	40.0%	71.88	100.64	40.0%	82.52	115.52	40.0%
62	82.52	115.52	40.0%	95.84	134.18	40.0%	109.14	152.80	40.0%	63.88	89.44	40.0%	74.54	104.36	40.0%	85.18	119.26	40.0%
63	86.52	121.12	40.0%	100.50	140.70	40.0%	114.46	160.24	40.0%	67.90	95.06	40.0%	79.20	110.88	40.0%	90.50	126.70	40.0%
64	90.50	126.70	40.0%	105.16	147.22	40.0%	119.80	167.72	40.0%	71.88	100.64	40.0%	83.86	117.40	40.0%	95.84	134.18	40.0%
65	97.18	136.06	40.0%	112.48	157.48	40.0%	127.78	178.90	40.0%	79.86	111.80	40.0%	93.18	130.46	40.0%	106.48	149.08	40.0%
66	110.48	154.68	40.0%	127.12	177.96	40.0%	143.74	201.24	40.0%	90.50	126.70	40.0%	105.16	147.22	40.0%	119.80	167.72	40.0%
67	122.46	171.44	40.0%	141.08	197.52	40.0%	159.72	223.60	40.0%	101.16	141.62	40.0%	117.12	163.96	40.0%	133.10	186.34	40.0%
68	138.42	193.78	40.0%	158.40	221.76	40.0%	178.36	249.70	40.0%	114.46	160.24	40.0%	131.78	184.50	40.0%	149.08	208.72	40.0%
69	149.08	208.72	40.0%	170.36	238.50	40.0%	191.66	268.32	40.0%	126.46	177.04	40.0%	145.76	204.06	40.0%	165.04	231.06	40.0%
70	167.70	234.78	40.0%	191.66	268.32	40.0%	215.62	301.86	40.0%	139.76	195.66	40.0%	160.40	224.56	40.0%	181.02	253.42	40.0%
71	178.36	249.70	40.0%	203.66	285.12	40.0%	228.94	320.52	40.0%	150.42	210.58	40.0%	172.38	241.34	40.0%	194.32	272.04	40.0%
72	191.66	268.32	40.0%	218.28	305.60	40.0%	244.90	342.86	40.0%	165.04	231.06	40.0%	189.00	264.60	40.0%	212.96	298.14	40.0%
73	206.32	288.84	40.0%	234.94	328.92	40.0%	263.54	368.96	40.0%	175.70	245.98	40.0%	201.00	281.40	40.0%	226.28	316.80	40.0%
74	219.62	307.46	40.0%	249.56	349.38	40.0%	279.52	391.32	40.0%	189.00	264.60	40.0%	215.62	301.86	40.0%	242.24	339.14	40.0%
75	234.26	327.96	40.0%	266.20	372.68	40.0%	298.14	417.40	40.0%	203.66	285.12	40.0%	232.28	325.20	40.0%	260.88	365.24	40.0%
76	267.54	374.56	40.0%	302.80	423.92	40.0%	338.08	473.32	40.0%	232.94	326.12	40.0%	264.22	369.90	40.0%	295.48	413.68	40.0%
77	300.80	421.12	40.0%	339.42	475.18	40.0%	378.00	529.20	40.0%	268.86	376.40	40.0%	303.46	424.84	40.0%	338.08	473.32	40.0%
78	334.10	467.74	40.0%	376.02	526.42	40.0%	417.94	585.12	40.0%	303.46	424.84	40.0%	342.08	478.92	40.0%	380.66	532.92	40.0%
79	367.36	514.30	40.0%	412.62	577.66	40.0%	457.86	641.00	40.0%	332.76	465.86	40.0%	374.02	523.62	40.0%	415.28	581.40	40.0%
80										370.02	518.02	40.0%	415.28	581.40	40.0%			
81										401.96	562.74	40.0%	449.88	629.84	40.0%			
82										436.56	611.18	40.0%	488.48	683.88	40.0%			
83										473.84	663.38	40.0%	529.74	741.64	40.0%			
84										508.44	711.82	40.0%	568.34	795.68	40.0%			

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD																		
Simple Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
41	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
42	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
43	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
44	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
45	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
46	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%	45.26	63.36	40.0%	51.92	72.68	40.0%	58.56	81.98	40.0%
47	59.90	83.86	40.0%	68.56	95.98	40.0%	77.20	108.08	40.0%	47.92	67.08	40.0%	54.58	76.42	40.0%	61.22	85.70	40.0%
48	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%	50.58	70.82	40.0%	58.56	81.98	40.0%	66.56	93.18	40.0%
49	63.88	89.44	40.0%	73.22	102.50	40.0%	82.52	115.52	40.0%	53.24	74.54	40.0%	61.22	85.70	40.0%	69.22	96.90	40.0%
50	67.90	95.06	40.0%	77.88	109.04	40.0%	87.84	122.98	40.0%	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%
51	67.90	95.06	40.0%	77.88	109.04	40.0%	87.84	122.98	40.0%	57.24	80.14	40.0%	65.90	92.26	40.0%	74.54	104.36	40.0%
52	73.22	102.50	40.0%	83.20	116.48	40.0%	93.18	130.46	40.0%	59.90	83.86	40.0%	68.56	95.98	40.0%	77.20	108.08	40.0%
53	74.54	104.36	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	61.22	85.70	40.0%	70.56	98.78	40.0%	79.86	111.80	40.0%
54	77.20	108.08	40.0%	87.84	122.98	40.0%	98.50	137.90	40.0%	63.88	89.44	40.0%	73.22	102.50	40.0%	82.52	115.52	40.0%
55	81.20	113.68	40.0%	92.52	129.52	40.0%	103.82	145.34	40.0%	67.90	95.06	40.0%	77.88	109.04	40.0%	87.84	122.98	40.0%
56	83.86	117.40	40.0%	95.18	133.26	40.0%	106.48	149.08	40.0%	73.22	102.50	40.0%	83.20	116.48	40.0%	93.18	130.46	40.0%
57	90.50	126.70	40.0%	102.50	143.50	40.0%	114.46	160.24	40.0%	79.86	111.80	40.0%	90.50	126.70	40.0%	101.16	141.62	40.0%
58	95.84	134.18	40.0%	109.14	152.80	40.0%	122.46	171.44	40.0%	83.86	117.40	40.0%	95.18	133.26	40.0%	106.48	149.08	40.0%
59	105.16	147.22	40.0%	119.14	166.80	40.0%	133.10	186.34	40.0%	90.50	126.70	40.0%	102.50	143.50	40.0%	114.46	160.24	40.0%
60	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%	95.84	134.18	40.0%	109.14	152.80	40.0%	122.46	171.44	40.0%
61	115.80	162.12	40.0%	131.12	183.56	40.0%	146.42	204.98	40.0%	105.16	147.22	40.0%	119.14	166.80	40.0%	133.10	186.34	40.0%
62	119.80	167.72	40.0%	135.76	190.06	40.0%	151.74	212.44	40.0%	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%
63	129.12	180.76	40.0%	145.76	204.06	40.0%	162.38	227.34	40.0%	115.80	162.12	40.0%	131.12	183.56	40.0%	146.42	204.98	40.0%
64	133.10	186.34	40.0%	150.42	210.58	40.0%	167.70	234.78	40.0%	119.80	167.72	40.0%	135.76	190.06	40.0%	151.74	212.44	40.0%
65	141.08	197.52	40.0%	159.72	223.60	40.0%	178.36	249.70	40.0%	129.12	180.76	40.0%	145.76	204.06	40.0%	162.38	227.34	40.0%
66	157.06	219.88	40.0%	177.04	247.86	40.0%	196.98	275.78	40.0%	141.08	197.52	40.0%	159.72	223.60	40.0%	178.36	249.70	40.0%
67	170.36	238.50	40.0%	191.66	268.32	40.0%	212.96	298.14	40.0%	154.40	216.16	40.0%	174.38	244.14	40.0%	194.32	272.04	40.0%
68	189.00	264.60	40.0%	212.96	298.14	40.0%	236.92	331.68	40.0%	165.04	231.06	40.0%	186.34	260.88	40.0%	207.64	290.70	40.0%
69	204.98	286.98	40.0%	230.28	322.40	40.0%	255.56	357.78	40.0%	177.04	247.86	40.0%	200.34	280.48	40.0%	223.60	313.04	40.0%
70	222.28	311.20	40.0%	249.56	349.38	40.0%	276.84	387.58	40.0%	190.34	266.48	40.0%	214.96	300.94	40.0%	239.58	335.42	40.0%
71	239.58	335.42	40.0%	268.86	376.40	40.0%	298.14	417.40	40.0%	201.00	281.40	40.0%	226.96	317.74	40.0%	252.90	354.06	40.0%
72	252.90	354.06	40.0%	283.52	396.92	40.0%	314.12	439.76	40.0%	214.30	300.02	40.0%	241.58	338.22	40.0%	268.86	376.40	40.0%
73	270.20	378.28	40.0%	302.80	423.92	40.0%	335.42	469.58	40.0%	226.28	316.80	40.0%	255.56	357.78	40.0%	284.84	398.78	40.0%
74	287.50	402.50	40.0%	322.10	450.94	40.0%	356.70	499.38	40.0%	239.58	335.42	40.0%	270.20	378.28	40.0%	300.80	421.12	40.0%
75	304.82	426.74	40.0%	341.42	477.98	40.0%	378.00	529.20	40.0%	250.22	350.30	40.0%	282.18	395.06	40.0%	314.12	439.76	40.0%
76	332.76	465.86	40.0%	372.68	521.76	40.0%	412.62	577.66	40.0%	278.20	389.48	40.0%	313.46	438.84	40.0%	348.72	488.20	40.0%
77	364.70	510.58	40.0%	407.28	570.20	40.0%	449.88	629.84	40.0%	308.80	432.32	40.0%	347.40	486.36	40.0%	386.00	540.40	40.0%
78	392.66	549.72	40.0%	438.58	614.02	40.0%	484.48	678.28	40.0%	335.42	469.58	40.0%	376.68	527.36	40.0%	417.94	585.12	40.0%
79	424.60	594.44	40.0%	474.52	664.32	40.0%	524.42	734.18	40.0%	370.02	518.02	40.0%	415.28	581.40	40.0%	460.52	644.72	40.0%
80										396.64	555.30	40.0%	444.56	622.38	40.0%			
81										427.26	598.16	40.0%	478.50	669.90	40.0%			
82										459.20	642.88	40.0%	514.44	720.22	40.0%			
83										491.16	687.62	40.0%	550.38	770.54	40.0%			
84										524.42	734.18	40.0%	586.98	821.78	40.0%			

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 16
RiverSource Life Insurance Company
Side-by-Side Comparison of Current and Proposed Premium Rates
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD																		
Compound Benefit Increase Option																		
Issue Age	20 Day Deductible Period									90 Day Deductible Period								
	50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage			50% Home Care Percentage			75% Home Care Percentage			100% Home Care Percentage		
	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹	Current Rate	Proposed Rate	% Rate Change ¹
40	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
41	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
42	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
43	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
44	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
45	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
46	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%	65.24	91.34	40.0%	73.88	103.44	40.0%	82.52	115.52	40.0%
47	85.18	119.26	40.0%	95.84	134.18	40.0%	106.48	149.08	40.0%	70.56	98.78	40.0%	79.20	110.88	40.0%	87.84	122.98	40.0%
48	85.18	119.26	40.0%	95.84	134.18	40.0%	106.48	149.08	40.0%	74.54	104.36	40.0%	83.86	117.40	40.0%	93.18	130.46	40.0%
49	89.18	124.86	40.0%	100.50	140.70	40.0%	111.80	156.52	40.0%	74.54	104.36	40.0%	83.86	117.40	40.0%	93.18	130.46	40.0%
50	89.18	124.86	40.0%	100.50	140.70	40.0%	111.80	156.52	40.0%	78.54	109.96	40.0%	88.52	123.92	40.0%	98.50	137.90	40.0%
51	93.18	130.46	40.0%	105.16	147.22	40.0%	117.12	163.96	40.0%	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%
52	93.18	130.46	40.0%	105.16	147.22	40.0%	117.12	163.96	40.0%	81.20	113.68	40.0%	91.20	127.68	40.0%	101.16	141.62	40.0%
53	101.16	141.62	40.0%	114.46	160.24	40.0%	127.78	178.90	40.0%	85.18	119.26	40.0%	95.84	134.18	40.0%	106.48	149.08	40.0%
54	101.16	141.62	40.0%	114.46	160.24	40.0%	127.78	178.90	40.0%	87.84	122.98	40.0%	98.50	137.90	40.0%	109.14	152.80	40.0%
55	105.16	147.22	40.0%	119.14	166.80	40.0%	133.10	186.34	40.0%	91.86	128.60	40.0%	103.16	144.42	40.0%	114.46	160.24	40.0%
56	109.14	152.80	40.0%	123.80	173.32	40.0%	138.42	193.78	40.0%	98.50	137.90	40.0%	110.48	154.68	40.0%	122.46	171.44	40.0%
57	115.80	162.12	40.0%	131.12	183.56	40.0%	146.42	204.98	40.0%	103.82	145.34	40.0%	117.12	163.96	40.0%	130.44	182.62	40.0%
58	125.12	175.16	40.0%	141.08	197.52	40.0%	157.06	219.88	40.0%	110.48	154.68	40.0%	124.46	174.24	40.0%	138.42	193.78	40.0%
59	131.78	184.50	40.0%	148.42	207.78	40.0%	165.04	231.06	40.0%	114.46	160.24	40.0%	129.12	180.76	40.0%	143.74	201.24	40.0%
60	138.42	193.78	40.0%	155.74	218.04	40.0%	173.04	242.26	40.0%	123.80	173.32	40.0%	139.10	194.74	40.0%	154.40	216.16	40.0%
61	146.42	204.98	40.0%	165.04	231.06	40.0%	183.68	257.16	40.0%	127.78	178.90	40.0%	143.74	201.24	40.0%	159.72	223.60	40.0%
62	155.74	218.04	40.0%	175.04	245.06	40.0%	194.32	272.04	40.0%	131.78	184.50	40.0%	148.42	207.78	40.0%	165.04	231.06	40.0%
63	162.38	227.34	40.0%	182.36	255.30	40.0%	202.32	283.24	40.0%	138.42	193.78	40.0%	155.74	218.04	40.0%	173.04	242.26	40.0%
64	169.04	236.66	40.0%	189.68	265.56	40.0%	210.30	294.42	40.0%	143.74	201.24	40.0%	162.38	227.34	40.0%	181.02	253.42	40.0%
65	178.36	249.70	40.0%	199.66	279.52	40.0%	220.94	309.32	40.0%	153.08	214.32	40.0%	172.38	241.34	40.0%	191.66	268.32	40.0%
66	201.00	281.40	40.0%	224.30	314.02	40.0%	247.56	346.58	40.0%	166.38	232.94	40.0%	187.02	261.82	40.0%	207.64	290.70	40.0%
67	219.62	307.46	40.0%	244.24	341.94	40.0%	268.86	376.40	40.0%	182.36	255.30	40.0%	204.32	286.04	40.0%	226.28	316.80	40.0%
68	242.24	339.14	40.0%	268.86	376.40	40.0%	295.48	413.68	40.0%	198.34	277.68	40.0%	222.94	312.12	40.0%	247.56	346.58	40.0%
69	264.88	370.84	40.0%	293.50	410.90	40.0%	322.10	450.94	40.0%	214.30	300.02	40.0%	240.26	336.36	40.0%	266.20	372.68	40.0%
70	287.50	402.50	40.0%	318.12	445.36	40.0%	348.72	488.20	40.0%	232.94	326.12	40.0%	261.56	366.18	40.0%	290.16	406.22	40.0%
71	308.80	432.32	40.0%	340.74	477.04	40.0%	372.68	521.76	40.0%	246.24	344.74	40.0%	276.18	386.66	40.0%	306.14	428.60	40.0%
72	331.44	464.02	40.0%	365.38	511.54	40.0%	399.30	559.02	40.0%	262.22	367.10	40.0%	293.50	410.90	40.0%	324.76	454.66	40.0%
73	354.04	495.66	40.0%	390.00	546.00	40.0%	425.92	596.28	40.0%	278.20	389.48	40.0%	312.14	437.00	40.0%	346.06	484.48	40.0%
74	375.34	525.48	40.0%	412.62	577.66	40.0%	449.88	629.84	40.0%	294.16	411.82	40.0%	329.42	461.18	40.0%	364.70	510.58	40.0%
75	399.30	559.02	40.0%	439.24	614.94	40.0%	479.16	670.82	40.0%	314.12	439.76	40.0%	351.38	491.94	40.0%	388.66	544.12	40.0%
76	431.24	603.74	40.0%	473.84	663.38	40.0%	516.42	722.98	40.0%	347.40	486.36	40.0%	388.00	543.20	40.0%	428.58	600.02	40.0%
77	464.54	650.36	40.0%	510.44	714.62	40.0%	556.36	778.90	40.0%	380.66	532.92	40.0%	424.60	594.44	40.0%	468.52	655.92	40.0%
78	500.46	700.64	40.0%	549.72	769.60	40.0%	598.96	838.54	40.0%	415.28	581.40	40.0%	461.86	646.60	40.0%	508.44	711.82	40.0%
79	532.40	745.36	40.0%	584.32	818.04	40.0%	636.22	890.70	40.0%	448.56	627.98	40.0%	498.48	697.88	40.0%	548.38	767.74	40.0%
80										480.50	672.70	40.0%	533.08	746.32	40.0%			
81										516.42	722.98	40.0%	572.34	801.28	40.0%			
82										549.72	769.60	40.0%	608.94	852.52	40.0%			
83										584.32	818.04	40.0%	646.20	904.68	40.0%			
84										617.58	864.62	40.0%	682.82	955.94	40.0%			

¹ The proposed rates are equal to 1.4 times the current rates, subject to a maximum rate of \$999.98

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

LIFETIME BENEFIT PERIOD																		
Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
41	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
42	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
43	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
44	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
45	104.36	119.26	134.18	85.70	98.78	111.80	165.88	189.14	212.44	152.80	173.32	193.78	223.60	251.58	279.52	201.24	225.48	249.70
46	104.36	119.26	134.18	85.70	98.78	111.80	169.60	192.86	216.16	152.80	173.32	193.78	231.06	259.02	286.98	208.72	232.94	257.16
47	106.24	122.06	137.90	87.58	101.58	115.52	178.90	203.14	227.34	158.40	179.84	201.24	240.40	269.28	298.14	216.16	242.26	268.32
48	106.24	122.06	137.90	91.34	105.30	119.26	186.34	212.44	238.50	162.12	183.56	204.98	253.42	283.24	313.04	221.76	248.78	275.78
49	111.80	128.60	145.34	93.18	108.08	122.98	190.06	216.16	242.26	163.96	186.34	208.72	262.76	293.50	324.24	229.20	256.22	283.24
50	111.80	128.60	145.34	96.90	111.80	126.70	195.66	222.68	249.70	167.72	190.06	212.44	281.40	314.02	346.58	234.78	262.76	290.70
51	115.52	134.18	152.80	98.78	114.60	130.46	201.24	229.20	257.16	177.04	200.32	223.60	288.84	321.46	354.06	240.40	269.28	298.14
52	119.26	137.90	156.52	98.78	114.60	130.46	204.98	232.94	260.88	177.04	200.32	223.60	298.14	331.68	365.24	251.58	280.48	309.32
53	121.12	140.70	160.24	108.08	124.86	141.62	210.58	239.48	268.32	182.62	206.86	231.06	307.46	341.94	376.40	257.16	286.98	316.80
54	121.12	140.70	160.24	108.08	124.86	141.62	219.88	249.70	279.52	186.34	210.58	234.78	320.52	355.94	391.32	262.76	293.50	324.24
55	126.70	147.22	167.72	115.52	134.18	152.80	225.48	256.22	286.98	193.78	219.88	245.98	333.56	369.90	406.22	273.92	306.54	339.14
56	136.06	157.48	178.90	119.26	137.90	156.52	240.40	273.00	305.60	206.86	233.86	260.88	354.06	391.32	428.60	294.42	327.96	361.50
57	149.08	171.44	193.78	128.60	148.14	167.72	257.16	290.70	324.24	223.60	251.58	279.52	370.84	409.02	447.22	314.94	349.38	383.86
58	158.40	181.70	204.98	137.90	158.40	178.90	270.20	304.66	339.14	236.66	265.56	294.42	393.20	433.28	473.32	331.68	367.10	402.50
59	167.72	191.94	216.16	147.22	168.68	190.06	290.70	326.12	361.50	253.42	283.24	313.04	413.68	454.66	495.66	352.22	388.56	424.84
60	182.62	208.72	234.78	156.52	178.90	201.24	303.74	340.08	376.40	273.92	306.54	339.14	430.48	472.38	514.30	368.96	406.22	443.50
61	191.94	218.96	245.98	163.96	186.34	208.72	320.52	357.78	395.06	290.70	324.24	357.78	450.94	493.80	536.64	389.48	427.68	465.86
62	201.24	229.20	257.16	169.60	192.86	216.16	337.28	375.48	413.68	303.74	338.22	372.68	467.74	511.54	555.30	411.82	451.90	491.94
63	210.58	239.48	268.32	182.62	206.86	231.06	355.94	396.00	436.04	320.52	355.94	391.32	488.20	532.92	577.66	428.60	469.58	510.58
64	223.60	253.42	283.24	193.78	219.88	245.98	368.96	409.94	450.94	333.56	369.90	406.22	508.74	554.38	600.02	449.10	491.00	532.92
65	236.66	269.28	301.86	203.14	230.14	257.16	391.32	434.20	477.04	355.94	394.12	432.32	531.08	578.62	626.10	467.74	511.54	555.30
66	277.68	312.12	346.58	236.66	265.56	294.42	452.82	498.46	544.12	406.22	447.22	488.20	603.74	654.08	704.36	527.36	574.90	622.38
67	324.24	361.50	398.78	281.40	314.02	346.58	516.18	565.54	614.94	460.26	504.08	547.84	678.28	732.34	786.36	585.12	635.44	685.72
68	368.96	409.94	450.94	316.80	352.22	387.58	577.66	629.84	682.00	516.18	563.70	611.18	747.24	804.08	860.88	644.72	698.80	752.80
69	419.28	463.10	506.86	355.94	394.12	432.32	637.28	693.20	749.08	573.92	624.26	674.54	827.34	888.86	950.34	702.52	759.34	816.18
70	464.02	511.54	559.02	393.20	435.12	477.04	700.64	760.26	819.90	626.10	680.14	734.18	900.04	964.32	999.98	756.54	816.18	875.82
71	505.00	554.38	603.74	430.48	474.26	518.02	764.00	827.34	890.70	678.28	734.18	790.08	968.96	999.98	999.98	816.18	879.54	942.88
72	555.30	607.46	659.66	467.74	515.26	562.74	825.50	891.66	957.80	736.06	794.76	853.44	999.98	999.98	999.98	873.96	940.10	999.98
73	600.02	655.92	711.82	506.86	557.18	607.46	888.86	958.74	999.98	788.22	850.66	913.08	999.98	999.98	999.98	933.58	999.98	999.98
74	642.88	701.60	760.26	544.12	598.16	652.20	950.34	999.98	999.98	842.26	907.48	972.70	999.98	999.98	999.98	991.34	999.98	999.98
75	695.08	757.48	819.90	587.00	643.80	700.64	999.98	999.98	999.98	901.88	970.84	999.98	999.98	999.98	999.98	999.98	999.98	999.98
76	750.96	820.84	890.70	635.44	699.72	764.00	999.98	999.98	999.98	970.84	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
77	810.60	887.94	965.24	683.88	755.60	827.34	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
78	866.48	951.30	999.98	732.34	811.52	890.70	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
79	926.12	999.98	999.98	780.78	867.42	954.08	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
 Premium Rates Per \$10 Daily Benefit

6 YEAR BENEFIT PERIOD																		
Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
41	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
42	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
43	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
44	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
45	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	149.08	167.72	186.34
46	85.70	98.78	111.80	74.54	85.70	96.90	122.98	139.78	156.52	104.36	119.26	134.18	178.90	201.24	223.60	152.80	171.44	190.06
47	87.58	101.58	115.52	74.54	85.70	96.90	130.46	149.08	167.72	108.08	122.98	137.90	184.50	207.78	231.06	158.40	177.96	197.52
48	87.58	101.58	115.52	76.42	88.50	100.64	136.06	155.60	175.16	113.68	129.52	145.34	188.22	211.52	234.78	162.12	181.70	201.24
49	89.44	104.36	119.26	76.42	88.50	100.64	143.50	163.04	182.62	117.40	133.26	149.08	193.78	218.04	242.26	171.44	191.94	212.44
50	93.18	108.08	122.98	81.98	95.06	108.08	149.08	169.60	190.06	122.98	139.78	156.52	197.52	221.76	245.98	180.76	202.22	223.60
51	95.06	110.88	126.70	81.98	95.06	108.08	154.68	176.12	197.52	122.98	139.78	156.52	204.98	231.06	257.16	184.50	205.94	227.34
52	95.06	110.88	126.70	81.98	95.06	108.08	158.40	179.84	201.24	126.70	143.50	160.24	212.44	238.50	264.60	190.06	212.44	234.78
53	96.90	113.68	130.46	83.86	97.86	111.80	163.96	186.34	208.72	134.18	152.80	171.44	218.04	245.06	272.04	193.78	216.16	238.50
54	96.90	113.68	130.46	83.86	97.86	111.80	169.60	192.86	216.16	141.62	160.24	178.90	221.76	248.78	275.78	199.38	222.68	245.98
55	104.36	122.98	141.62	89.44	104.36	119.26	178.90	203.14	227.34	147.22	166.80	186.34	227.34	255.30	283.24	212.44	236.66	260.88
56	111.80	130.46	149.08	93.18	108.08	122.98	190.06	216.16	242.26	156.52	177.04	197.52	240.40	269.28	298.14	223.60	249.70	275.78
57	121.12	140.70	160.24	98.78	114.60	130.46	199.38	226.40	253.42	165.88	187.30	208.72	257.16	286.98	316.80	236.66	263.68	290.70
58	130.46	150.94	171.44	108.08	124.86	141.62	216.16	244.14	272.04	182.62	204.98	227.34	277.68	308.40	339.14	253.42	281.40	309.32
59	136.06	157.48	178.90	119.26	137.90	156.52	225.48	254.38	283.24	191.94	215.24	238.50	292.58	325.20	357.78	266.48	295.38	324.24
60	149.08	171.44	193.78	124.86	144.42	163.96	238.50	268.32	298.14	208.72	232.94	257.16	313.04	346.58	380.12	283.24	313.04	342.86
61	156.52	178.90	201.24	128.60	148.14	167.72	251.58	282.32	313.04	219.88	245.98	272.04	326.12	360.58	395.06	296.30	327.04	357.78
62	162.12	185.42	208.72	137.90	158.40	178.90	262.76	295.38	327.96	229.20	256.22	283.24	339.14	374.56	409.94	314.94	347.54	380.12
63	171.44	195.66	219.88	147.22	168.68	190.06	275.78	309.32	342.86	245.98	273.92	301.86	359.66	396.00	432.32	327.96	361.50	395.06
64	186.34	212.44	238.50	152.80	175.16	197.52	288.84	323.32	357.78	255.30	284.20	313.04	376.40	413.68	450.94	344.74	379.20	413.68
65	195.66	222.68	249.70	162.12	185.42	208.72	303.74	340.08	376.40	270.20	300.94	331.68	396.92	437.00	477.04	357.78	393.20	428.60
66	225.48	254.38	283.24	190.06	216.16	242.26	344.74	384.80	424.84	313.04	346.58	380.12	450.94	493.80	536.64	396.92	435.12	473.32
67	259.02	291.64	324.24	219.88	247.86	275.78	391.32	434.20	477.04	355.94	392.28	428.60	505.00	552.52	600.02	439.76	482.64	525.48
68	288.84	323.32	357.78	242.26	272.04	301.86	434.20	479.84	525.48	396.92	437.00	477.04	559.02	609.34	659.66	486.36	532.00	577.66
69	320.52	357.78	395.06	275.78	309.32	342.86	475.18	524.56	573.92	437.92	479.84	521.76	616.82	671.78	726.74	529.20	579.54	629.84
70	350.30	391.32	432.32	305.60	341.02	376.40	521.76	573.92	626.10	480.76	525.48	570.20	667.10	724.90	782.62	575.82	630.78	685.72
71	380.12	423.00	465.86	331.68	368.96	406.22	566.46	622.38	678.28	525.48	573.92	622.38	724.90	787.30	849.72	618.66	676.42	734.18
72	411.82	457.46	503.14	365.24	406.22	447.22	605.62	664.32	722.98	562.74	613.08	663.38	778.90	844.14	909.32	661.52	723.96	786.36
73	443.50	491.94	540.40	391.32	434.20	477.04	650.36	712.76	775.18	611.18	665.26	719.26	832.94	902.84	972.70	704.36	769.60	834.80
74	475.18	526.42	577.66	421.12	465.86	510.58	696.92	762.16	827.34	650.36	707.16	764.00	886.98	959.68	999.98	747.24	817.12	886.98
75	512.46	567.42	622.38	450.94	499.38	547.84	743.52	813.40	883.26	693.20	752.80	812.44	948.50	999.98	999.98	795.68	869.28	942.88
76	575.82	634.50	693.20	514.30	566.46	618.66	829.22	904.68	980.14	778.90	844.14	909.32	999.98	999.98	999.98	883.26	963.40	999.98
77	641.00	704.36	767.74	579.54	636.36	693.20	913.08	993.22	999.98	864.62	935.42	999.98	999.98	999.98	999.98	974.56	999.98	999.98
78	704.36	771.46	838.54	644.72	706.24	767.74	999.98	999.98	999.98	955.94	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98
79	775.18	847.86	920.52	713.70	779.86	846.00	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98	999.98

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

4 YEAR BENEFIT PERIOD

Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
41	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
42	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
43	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
44	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
45	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
46	70.82	81.98	93.18	50.32	58.72	67.08	104.36	119.26	134.18	85.70	98.78	111.80	160.24	178.90	197.52	141.62	156.52	171.44
47	70.82	81.98	93.18	50.32	58.72	67.08	108.08	122.98	137.90	85.70	98.78	111.80	167.72	186.34	204.98	141.62	156.52	171.44
48	72.68	84.78	96.90	52.16	61.52	70.82	109.96	125.78	141.62	89.44	102.50	115.52	169.60	189.14	208.72	147.22	163.04	178.90
49	76.42	88.50	100.64	55.92	65.24	74.54	113.68	129.52	145.34	91.34	105.30	119.26	173.32	192.86	212.44	147.22	163.04	178.90
50	78.26	91.34	104.36	59.64	70.82	81.98	119.26	136.06	152.80	95.06	109.04	122.98	178.90	199.38	219.88	152.80	169.60	186.34
51	78.26	91.34	104.36	59.64	70.82	81.98	119.26	136.06	152.80	95.06	109.04	122.98	178.90	199.38	219.88	152.80	169.60	186.34
52	81.98	95.06	108.08	67.08	78.26	89.44	122.98	139.78	156.52	96.90	111.80	126.70	182.62	203.14	223.60	152.80	169.60	186.34
53	83.86	97.86	111.80	68.96	81.06	93.18	126.70	145.34	163.96	104.36	119.26	134.18	184.50	205.94	227.34	160.24	178.90	197.52
54	83.86	97.86	111.80	68.96	81.06	93.18	130.46	149.08	167.72	104.36	119.26	134.18	188.22	209.66	231.06	160.24	178.90	197.52
55	89.44	104.36	119.26	74.54	87.58	100.64	136.06	155.60	175.16	109.96	125.78	141.62	193.78	216.16	238.50	169.60	189.14	208.72
56	93.18	108.08	122.98	78.26	91.34	104.36	149.08	169.60	190.06	119.26	136.06	152.80	206.86	230.14	253.42	178.90	199.38	219.88
57	98.78	114.60	130.46	83.86	97.86	111.80	158.40	179.84	201.24	130.46	149.08	167.72	216.16	240.40	264.60	188.22	209.66	231.06
58	108.08	124.86	141.62	89.44	104.36	119.26	167.72	190.06	212.44	143.50	163.04	182.62	232.94	259.96	286.98	197.52	219.88	242.26
59	119.26	137.90	156.52	95.06	110.88	126.70	180.76	204.06	227.34	152.80	173.32	193.78	245.98	273.92	301.86	216.16	240.40	264.60
60	124.86	144.42	163.96	108.08	124.86	141.62	193.78	219.88	245.98	167.72	190.06	212.44	260.88	290.70	320.52	227.34	253.42	279.52
61	130.46	150.94	171.44	111.80	128.60	145.34	203.14	230.14	257.16	180.76	204.06	227.34	270.20	300.94	331.68	236.66	263.68	290.70
62	139.78	161.20	182.62	119.26	137.90	156.52	216.16	244.14	272.04	190.06	214.32	238.50	285.12	317.74	350.30	255.30	284.20	313.04
63	149.08	171.44	193.78	124.86	144.42	163.96	225.48	254.38	283.24	201.24	227.34	253.42	300.02	334.48	368.96	264.60	294.42	324.24
64	154.68	177.96	201.24	130.46	150.94	171.44	234.78	264.60	294.42	214.32	241.34	268.32	309.32	344.74	380.12	277.68	308.40	339.14
65	163.96	188.22	212.44	139.78	161.20	182.62	255.30	287.92	320.52	229.20	258.10	286.98	327.96	365.24	402.50	294.42	327.96	361.50
66	191.94	218.96	245.98	162.12	185.42	208.72	288.84	323.32	357.78	259.02	289.78	320.52	368.96	409.94	450.94	329.84	366.18	402.50
67	219.88	249.70	279.52	190.06	216.16	242.26	324.24	361.50	398.78	296.30	330.76	365.24	411.82	455.62	499.38	370.84	410.90	450.94
68	244.14	276.76	309.32	216.16	244.14	272.04	365.24	406.22	447.22	329.84	366.18	402.50	460.26	507.80	555.30	409.94	452.82	495.66
69	272.04	307.46	342.86	234.78	264.60	294.42	400.66	444.44	488.20	363.38	403.46	443.50	505.00	556.24	607.46	456.54	504.08	551.58
70	300.02	338.22	376.40	264.60	298.14	331.68	441.64	489.16	536.64	398.78	441.64	484.48	549.72	604.68	659.66	495.66	546.00	596.28
71	327.96	368.96	409.94	290.70	326.12	361.50	477.04	527.36	577.66	432.32	477.04	521.76	592.56	650.36	708.10	532.92	587.00	641.00
72	352.22	396.00	439.76	309.32	346.58	383.86	514.30	568.34	622.38	465.86	514.30	562.74	639.16	701.60	764.00	573.92	631.70	689.48
73	378.28	423.92	469.58	337.28	377.36	417.40	553.44	610.26	667.10	499.38	549.72	600.02	682.00	747.24	812.44	614.94	676.42	737.92
74	408.10	457.46	506.86	363.38	405.30	447.22	592.56	652.20	711.82	536.64	590.72	644.72	730.46	799.42	868.34	654.08	718.34	782.62
75	439.76	491.94	544.12	391.32	436.04	480.76	633.56	696.92	760.26	572.06	628.90	685.72	775.18	847.86	920.52	700.64	769.60	838.54
76	501.28	558.10	614.94	449.10	498.46	547.84	700.64	769.60	838.54	639.16	701.60	764.00	844.14	923.32	999.98	769.60	845.06	920.52
77	559.02	620.54	682.00	510.58	564.62	618.66	769.60	843.22	916.80	708.10	775.18	842.26	913.08	998.78	999.98	836.70	917.76	998.78
78	622.38	687.62	752.80	573.92	631.70	689.48	842.26	922.40	999.98	780.78	854.40	927.98	985.76	999.98	999.98	909.32	996.94	999.98
79	685.72	756.54	827.34	637.28	700.64	764.00	913.08	998.78	999.98	851.60	930.78	999.98	999.98	999.98	999.98	978.30	999.98	999.98
80				700.64	767.74					924.26	999.98					999.98	999.98	
81				762.16	833.86					998.78	999.98					999.98	999.98	
82				829.22	906.56					999.98	999.98					999.98	999.98	
83				896.30	979.22					999.98	999.98					999.98	999.98	
84				957.80	999.98					999.98	999.98					999.98	999.98	

Exhibit 17
RiverSource Life Insurance Company
Premium Rates with 40% Rate Increase
Comprehensive Reimbursement Policy
Policy Form 30160A-VA, Subject to Endorsement Form 32100
Premium Rates Per \$10 Daily Benefit

2 YEAR BENEFIT PERIOD																		
Issue Age	No Benefit Increase Option						Simple Benefit Option						Compound Benefit Option					
	20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period			20 Day Deductible Period			90 Day Deductible Period		
	Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage			Home Care Percentage		
	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%	50%	75%	100%
40	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
41	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
42	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
43	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
44	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
45	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
46	50.32	58.72	67.08	39.14	45.66	52.16	80.14	92.26	104.36	63.36	72.68	81.98	113.68	127.68	141.62	91.34	103.44	115.52
47	50.32	58.72	67.08	39.14	45.66	52.16	83.86	95.98	108.08	67.08	76.42	85.70	119.26	134.18	149.08	98.78	110.88	122.98
48	52.16	61.52	70.82	41.00	48.44	55.92	85.70	98.78	111.80	70.82	81.98	93.18	119.26	134.18	149.08	104.36	117.40	130.46
49	52.16	61.52	70.82	41.00	48.44	55.92	89.44	102.50	115.52	74.54	85.70	96.90	124.86	140.70	156.52	104.36	117.40	130.46
50	59.64	70.82	81.98	46.60	55.00	63.36	95.06	109.04	122.98	80.14	92.26	104.36	124.86	140.70	156.52	109.96	123.92	137.90
51	59.64	70.82	81.98	46.60	55.00	63.36	95.06	109.04	122.98	80.14	92.26	104.36	130.46	147.22	163.96	113.68	127.68	141.62
52	59.64	70.82	81.98	46.60	55.00	63.36	102.50	116.48	130.46	83.86	95.98	108.08	130.46	147.22	163.96	113.68	127.68	141.62
53	61.52	73.62	85.70	48.44	57.80	67.08	104.36	119.26	134.18	85.70	98.78	111.80	141.62	160.24	178.90	119.26	134.18	149.08
54	61.52	73.62	85.70	48.44	57.80	67.08	108.08	122.98	137.90	89.44	102.50	115.52	141.62	160.24	178.90	122.98	137.90	152.80
55	70.82	83.86	96.90	55.92	67.08	78.26	113.68	129.52	145.34	95.06	109.04	122.98	147.22	166.80	186.34	128.60	144.42	160.24
56	74.54	87.58	100.64	55.92	67.08	78.26	117.40	133.26	149.08	102.50	116.48	130.46	152.80	173.32	193.78	137.90	154.68	171.44
57	80.14	94.14	108.08	61.52	73.62	85.70	126.70	143.50	160.24	111.80	126.70	141.62	162.12	183.56	204.98	145.34	163.96	182.62
58	85.70	100.64	115.52	70.82	83.86	96.90	134.18	152.80	171.44	117.40	133.26	149.08	175.16	197.52	219.88	154.68	174.24	193.78
59	91.34	107.16	122.98	74.54	87.58	100.64	147.22	166.80	186.34	126.70	143.50	160.24	184.50	207.78	231.06	160.24	180.76	201.24
60	100.64	117.40	134.18	80.14	94.14	108.08	152.80	173.32	193.78	134.18	152.80	171.44	193.78	218.04	242.26	173.32	194.74	216.16
61	108.08	124.86	141.62	85.70	100.64	115.52	162.12	183.56	204.98	147.22	166.80	186.34	204.98	231.06	257.16	178.90	201.24	223.60
62	115.52	134.18	152.80	89.44	104.36	119.26	167.72	190.06	212.44	152.80	173.32	193.78	218.04	245.06	272.04	184.50	207.78	231.06
63	121.12	140.70	160.24	95.06	110.88	126.70	180.76	204.06	227.34	162.12	183.56	204.98	227.34	255.30	283.24	193.78	218.04	242.26
64	126.70	147.22	167.72	100.64	117.40	134.18	186.34	210.58	234.78	167.72	190.06	212.44	236.66	265.56	294.42	201.24	227.34	253.42
65	136.06	157.48	178.90	111.80	130.46	149.08	197.52	223.60	249.70	180.76	204.06	227.34	249.70	279.52	309.32	214.32	241.34	268.32
66	154.68	177.96	201.24	126.70	147.22	167.72	219.88	247.86	275.78	197.52	223.60	249.70	281.40	314.02	346.58	232.94	261.82	290.70
67	171.44	197.52	223.60	141.62	163.96	186.34	238.50	268.32	298.14	216.16	244.14	272.04	307.46	341.94	376.40	255.30	286.04	316.80
68	193.78	221.76	249.70	160.24	184.50	208.72	264.60	298.14	331.68	231.06	260.88	290.70	339.14	376.40	413.68	277.68	312.12	346.58
69	208.72	238.50	268.32	177.04	204.06	231.06	286.98	322.40	357.78	247.86	280.48	313.04	370.84	410.90	450.94	300.02	336.36	372.68
70	234.78	268.32	301.86	195.66	224.56	253.42	311.20	349.38	387.58	266.48	300.94	335.42	402.50	445.36	488.20	326.12	366.18	406.22
71	249.70	285.12	320.52	210.58	241.34	272.04	335.42	376.40	417.40	281.40	317.74	354.06	432.32	477.04	521.76	344.74	386.66	428.60
72	268.32	305.60	342.86	231.06	264.60	298.14	354.06	396.92	439.76	300.02	338.22	376.40	464.02	511.54	559.02	367.10	410.90	454.66
73	288.84	328.92	368.96	245.98	281.40	316.80	378.28	423.92	469.58	316.80	357.78	398.78	495.66	546.00	596.28	389.48	437.00	484.48
74	307.46	349.38	391.32	264.60	301.86	339.14	402.50	450.94	499.38	335.42	378.28	421.12	525.48	577.66	629.84	411.82	461.18	510.58
75	327.96	372.68	417.40	285.12	325.20	365.24	426.74	477.98	529.20	350.30	395.06	439.76	559.02	614.94	670.82	439.76	491.94	544.12
76	374.56	423.92	473.32	326.12	369.90	413.68	465.86	521.76	577.66	389.48	438.84	488.20	603.74	663.38	722.98	486.36	543.20	600.02
77	421.12	475.18	529.20	376.40	424.84	473.32	510.58	570.20	629.84	432.32	486.36	540.40	650.36	714.62	778.90	532.92	594.44	655.92
78	467.74	526.42	585.12	424.84	478.92	532.92	549.72	614.02	678.28	469.58	527.36	585.12	700.64	769.60	838.54	581.40	646.60	711.82
79	514.30	577.66	641.00	465.86	523.62	581.40	594.44	664.32	734.18	518.02	581.40	644.72	745.36	818.04	890.70	627.98	697.88	767.74
80				518.02	581.40					555.30	622.38					672.70	746.32	
81				562.74	629.84					598.16	669.90					722.98	801.28	
82				611.18	683.88					642.88	720.22					769.60	852.52	
83				663.38	741.64					687.62	770.54					818.04	904.68	
84				711.82	795.68					734.18	821.78					864.62	955.94	

Long Term Care Insurance Rate Request Summary
Part 1 – To Be Completed By Company

Reset Form

Company Name and NAIC Number:	RiverSource Life Insurance Company, #65005
SERFF Tracking Number:	AERS-131005512
Effective Date:	Upon approval

Revised Rates

Average Annual Premium Per Member:	2,550
Average Requested Percentage Rate Change Per Member:	39.9
Minimum Requested Percentage Rate Change Per Member:	0.0%
Maximum Requested Percentage Rate Change Per Member:	40.0%
Number of Policy Holders Affected :	1,501

Plans Affected

(The Form Number and “Product Name”)

Form#	“Product Name”(if applicable)
30160A-VA, issued with Endorsement Form 32100	

Attach a brief narrative to summarize the key information used to develop the rates including the main drivers for the revised rates.

This document is intended to help explain the rate filing and it is only a summary of the company’s request. It is not intended to describe or include all factors or information considered in the review process. For more detailed information, please refer to the complete filing.

Narrative: Explanation of Justification for Rate Increase

Rates are being raised on all policies issued under these policy forms to offset anticipated claims that are higher than previously expected. This is due in part to individuals living longer and keeping their policies longer, which has resulted in more claims being filed than we anticipated when this policy was originally priced. As a result, premiums need to be adjusted to ensure there is adequate funding to pay current and anticipated future claims. This premium increase is designed to offset some of these anticipated increased costs and in no way reflects on the integrity of an individual's policy, nor is it based on an individual's claims history, age, health status, or any other personal factor.

As required, we have filed our request for this premium increase with the Virginia Bureau of Insurance and included the necessary actuarial data and other items requested by the Virginia Bureau of Insurance to support the increase.

April 10, 2020

JOHN DOE
STREET ADDRESS
City, VA 99999-9999

Notice of Premium Rate Increase

The premium on your long-term care insurance policy is increasing beginning July 15, 2020.

You have three options:

- 1** Keep your current coverage the same and accept the premium increase.
- 2** Adjust your coverage to help reduce your future premium.
- 3** Convert to a paid-up policy with reduced benefits.

For more information, review the enclosed Frequently Asked Questions or call our office at **1-800-862-7919**.

Policy Number: 9100-3000000-7 004.

Dear JOHN DOE,

Thank you for choosing RiverSource Insurance for your long-term care needs. We are writing to inform you of some important information regarding your *RiverSource*® long-term care insurance policy referenced above.

To ensure we can keep our commitments to you and meet your long-term care needs, the premium for your policy will increase on your policy anniversary, July 15, 2020; however, there are options explained on the next page that will allow you to minimize the impact of this premium increase or reduce your premium by adjusting your coverage.

Please note that you have a right to a revised premium or rate schedule upon request.

On July 15, 2020, your annual premium will increase from \$3,167.80 to \$4,435.00.

Reasons for this increase

We continuously review our long-term care business to give you confidence that the coverage you purchased is available when you need it. Unfortunately, we determined that a premium increase is necessary on all policies like yours because the cost of care continues to rise across the country due to people living longer, filing more claims, and staying on claims longer than initially anticipated.

We want you to be aware this increase is not due to a change in your health, age or claims history and in no way reflects on the integrity of your policy or the strength of our company. It is an increase based on our claims experience with all long-term care insurance policies like yours and has been filed with the Virginia State Corporation Commission. The Commission has reviewed the request for this premium increase for compliance with applicable Virginia state laws, rules and regulations and has approved this

premium increase. All premium rate increase filings are available for public inspection and may be accessed online through the Commission's website at www.scc.virginia.gov/BOI.

As explained in your policy, premium rates are not guaranteed and are likely to increase again in the future, if allowed by the state of Virginia; however, Virginia requires that premium rates cannot increase for at least three years. Prior to this increase, there have been three premium increases approved in Virginia on policies like yours, including three consecutive 10% increases.

Carefully consider your options outlined below

Given this change, we're offering you options to adjust your coverage. It's important that you determine which option best suits your individual circumstances and anticipated future needs. Please carefully consider the need and expenses associated with long-term care before you make any decisions and understand that these options may not all be of equal value to you.

The below feature(s) of your policy may be adjusted to manage your premium. Please be aware, there may be other features, not listed below, that can be adjusted to help minimize this premium increase or reduce your premium.

- Daily Benefit Amount: Maximum daily benefit we will pay according to your policy.
- Benefit Period: Total length of time benefits will be paid under your policy.

1 Keep your current coverage – your annual premium will increase from \$3,167.80 to \$4,435.00.

- Daily Benefit Amount: \$100.00
- Benefit Period: Unlimited

2 Adjust your coverage

One way to manage your premium is to adjust your coverage by shortening your Benefit Period, reducing your Current Daily Benefit Amount, or a combination of the two. Keep in mind, your policy may contain other benefit amounts that will decrease proportionally if you reduce your Daily Benefit Amount. The table below shows your new annual premium, beginning July 15, 2020, should you adjust these features.

	Keep Current Coverage	Shorten Benefit Period	Further Shorten Benefit Period	Reduce Daily Benefit Amount	Shorten Benefit Period & Reduce Daily Benefit Amount
Daily Benefit Amount	\$100.00	\$100.00	\$100.00	\$71.43	\$71.43
Benefit Period	Unlimited	6 years	4 years	Unlimited	4 years
Current Premium	\$3,167.80				
New Premium as of July 15, 2020	\$4,435.00	\$3,428.60	\$2,795.20	\$3,167.92	\$1,996.61

This table represents a few options of how you can adjust your coverage – the shaded boxes reflect what options have changed. This illustrates common options; however, additional options may be available. You may contact our office or your Ameriprise financial advisor for additional information regarding your available options.

3 Convert to a paid-up policy with reduced benefits

You have the option to stop paying premiums within 120 days following your policy anniversary, July 15, 2020, and convert to a paid-up policy with a Lifetime Maximum Benefit Amount of approximately \$23,070.00. This amount is equal to the sum of all premiums you have paid into your policy and will never be greater than the benefit you would have received if you continue to pay premiums. It's an estimate as of the date of this letter and can change. Once the total benefits paid on your policy reach this Lifetime Maximum Benefit Amount, no additional benefits are payable. **Please carefully consider**

this option before you select it because you may be significantly reducing your policy benefits.

Please note that you can modify your benefits at any time and these options, or options similar to them, will be available to you if there are any additional premium increases on your policy in the future.

Your next steps

Action may be needed depending on which option you choose. *Keep in mind, if you adjust your coverage or convert to a paid-up policy, you will not be able to increase it again in the future.*

Keep your current coverage

No action is needed to keep your current coverage other than paying your increased premium when it becomes effective, July 15, 2020.

Adjust your coverage

Complete the enclosed form and return it to us in the envelope provided by June 15, 2020 to ensure changes to your coverage are processed before the effective date of this increase.

Convert to a paid-up policy

Complete the enclosed form and return it to us in the envelope provided by June 15, 2020 to ensure changes to your coverage are processed before the effective date of this increase.

Depending on your payment method and tax withholding election, your payment amount may automatically update as a result of this premium increase. However, there are situations where you may need to take action to adjust your payment amount. Please see the enclosed Frequently Asked Questions document for additional information.

Questions? We're here to help. Please contact:

- Your financial advisor, John Smith, at 999-999-9999, or
- A RiverSource client service representative at **1-800-862-7919** and say "Long-Term Care" at the prompt. Representatives are available Monday through Friday, 7 a.m. to 6 p.m. Central time.

Thank you for choosing RiverSource Insurance. We value you as a client and look forward to continuing to serve you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Poor", is positioned to the left of a vertical yellow line.

Jay Poor

Vice President – RiverSource Service Operations and Contract Administration

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April 10, 2020

Notice of Premium Rate Increase

JOHN DOE
STREET ADDRESS
City, VA 99999-9999

Policy Number: 9100-1000000-7 004.

Dear JOHN DOE,

Thank you for choosing RiverSource Insurance for your long-term care needs. We are writing to inform you of some important information regarding your *RiverSource*® long-term care insurance policy referenced above.

To ensure we can keep our commitments to you and meet your long-term care needs, the premium for your policy will increase on your policy anniversary, July 15, 2020.

On July 15, 2020, your annual premium will increase from \$3,167.80 to \$4,435.00.

While this increase applies to all policies like yours, your premium is currently being waived while you are receiving long-term care benefits. Your obligation to pay premiums for your policy will not restart as long as you meet the policy's provisions for having your premiums waived.

Please note that you have a right to a revised premium or rate schedule upon request.

Reasons for this increase

We continuously review our long-term care business to give you confidence that the coverage you purchased is available when you need it. Unfortunately, we determined that a premium increase is necessary on all policies like yours because the cost of care continues to rise across the country due to people living longer, filing more claims, and staying on claims longer than initially anticipated.

We want you to be aware this increase is not due to a change in your health, age or claims history and in no way reflects on the integrity of your policy or the strength of our company. It is an increase based on our claims experience with all long-term care insurance policies like yours and has been filed with the Virginia State Corporation Commission. The Commission has reviewed the request for this premium increase for compliance with applicable Virginia state laws, rules and regulations and has approved this premium increase. All premium rate increase filings are available for public inspection and may be accessed online through the Commission's website at www.scc.virginia.gov/BOI.

As explained in your policy, premium rates are not guaranteed and are likely to increase again in the future, if allowed by the state of Virginia; however, Virginia requires that premium rates cannot increase for at least three years. Prior to this increase, there have been three premium increases approved in Virginia on policies like yours, including three consecutive 10% increases.

Your available options

You do not need to take any action to adjust your coverage at this time. Please be assured that we remain committed to helping you meet your long-term protection needs. If you begin paying premiums again,

The below feature(s) of your policy may be adjusted to manage your premium. Please be aware, there may be other features, not listed below, that can be adjusted to help minimize this premium increase or reduce your premium.

- Daily Benefit Amount: Maximum daily benefit we will pay according to your policy.
- Benefit Period: Total length of time benefits will be paid under your policy.

1 Keep your current coverage – your annual premium will increase from \$3,167.80 to \$4,435.00.

- Daily Benefit Amount: \$100.00
- Benefit Period: Unlimited

2 Adjust your coverage

One way to manage your premium is to adjust your coverage by shortening your Benefit Period, reducing your Current Daily Benefit Amount, or a combination of the two. Keep in mind, your policy may contain other benefit amounts that will decrease proportionally if you reduce your Daily Benefit Amount. The table below shows your new annual premium, beginning July 15, 2020, should you adjust these features.

	Keep Current Coverage	Shorten Benefit Period	Further Shorten Benefit Period	Reduce Daily Benefit Amount	Shorten Benefit Period & Reduce Daily Benefit Amount
Daily Benefit Amount	\$100.00	\$100.00	\$100.00	\$71.43	\$71.43
Benefit Period	Unlimited	6 years	4 years	Unlimited	4 years
Current Premium	\$3,167.80				
New Premium as of July 15, 2020	\$4,435.00	\$3,428.60	\$2,795.20	\$3,167.92	\$1,996.61

This table represents a few options of how you can adjust your coverage – the shaded boxes reflect what options have changed. This illustrates common options; however, additional options may be available. You may contact our office or your Ameriprise financial advisor for additional information regarding your available options.

3 Convert to a paid-up policy with reduced benefits

You have the option to stop paying premiums within 120 days following your policy anniversary, July 15, 2020, and convert to a paid-up policy with a Lifetime Maximum Benefit Amount of approximately \$23,070.00. This amount is equal to the sum of all premiums you have paid into your policy and will never be greater than the benefit you would have received if you continue to pay premiums. It's an estimate as of the date of this letter and can change. Once the total benefits paid on your policy reach this Lifetime Maximum Benefit Amount, no additional benefits are payable. **Please carefully consider this option before you select it because you may be significantly reducing your policy benefits.**

Please note that you can modify your benefits at any time and these options, or options similar to them, will be available to you if there are any additional premium increases on your policy in the future.

No action is needed at this time

Please be assured that we remain committed to helping you meet your long-term protection needs. If you begin paying premiums again, feel free to contact us to discuss potential options you may have to minimize the impact of this premium increase.

Questions? We're here to help. Please contact:

- Your financial advisor, John Smith at 999-999-9999, or
- A RiverSource client service representative at **1-800-862-7919** and say "Long-Term Care" at the prompt. Representatives are available Monday through Friday, 7 a.m. to 6 p.m. Central time.

Thank you for choosing RiverSource Insurance. We value you as a client and look forward to continuing to serve you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Poor", is positioned to the left of a thin vertical yellow line.

Jay Poor
Vice President – RiverSource Service Operations and Contract Administration

Long-Term Care Policy Change Request Form – Return this page

Policy Owner
JOHN DOE

Policy number
9100-3000000-7 004

Important information

- Do not complete this form if you wish to keep your current coverage. Instead, pay your increased premium when it becomes effective, July 15, 2020. At that time, your annual premium will increase from \$3,167.80 to \$4,435.00.
- Your policy may contain other benefit amounts that will decrease proportionally if you reduce your Daily Benefit Amount.
- To adjust your coverage, complete this form and return it to us in the enclosed envelope by **June 15, 2020** to ensure your request is processed as of your anniversary date.
- The coverage change options shown are common; however, you may have alternative options available to minimize the impact of this premium increase. For more information, call our office at **1-800-862-7919**.

Select one coverage adjustment below

If you adjust your benefits or convert to a paid-up policy, you cannot increase your coverage in the future.

Coverage Change Options		New Premium as of July 15, 2020
<input type="radio"/>	Shorten your Benefit Period from Unlimited to 6 years	\$3,428.60
<input type="radio"/>	Shorten your Benefit Period from Unlimited to 4 years	\$2,795.20
<input type="radio"/>	Reduce your Daily Benefit Amount from \$100.00 to \$71.43	\$3,167.92
<input type="radio"/>	Shorten your Benefit Period from Unlimited to 4 years and reduce your Daily Benefit Amount from \$100.00 to \$71.43	\$1,996.61
<input type="radio"/>	Convert to a paid-up policy and stop paying premiums	\$0.00

Detail other coverage adjustments below, if the options above do not meet your needs – please call our office or your Ameriprise financial advisor to learn more.

Acknowledge and Sign

By signing this form, you authorize RiverSource Life Insurance Company to modify your coverage based on your selection above.

X

Policy Signature

Date

If signing as fiduciary, in what capacity are you acting?

For fiduciary requirements, contact 1-800-862-7919.

Only RiverSource Life Insurance Co. of New York is authorized to sell insurance and annuities in New York.

RiverSource Life Insurance Company
70100 Ameriprise Financial Center
Minneapolis, MN 55474

1-800-862-7919

Endorsement to Policy

Policy: 9100-1234567-7 004

Insured John Doe

This endorsement is made a part of the policy to which it is attached. This endorsement confirms Your election to change the policy as follows:

Daily Benefit Amount

Original Nursing Home Daily Benefit changed to \$XX.XX

Original Daily Benefit – Nursing Home changed to \$XX.XX

Original Daily Benefit – Alternate Long-Term Care Facility changed to \$XX.XX

Original Covered Care Daily Maximum changed to \$XX.XX

Original Facility Care Daily Maximum Benefit Amount changed to \$XX.XX

Original Home and Community Care Daily Maximum Benefit Amount changed to \$XX.XX

Benefit Period

Nursing Home Benefit Limit changed to XX days

Confinement Benefit Limit changed to XX days

Home Care Rider Maximum Payment Period changed to XX days

Covered Care Maximum Payment Period changed to XX days

Lifetime Maximum Benefit Amount changed to \$XXX,XXX (YYYY days x \$ZZZ)

Elimination Period

Nursing Home Deductible Period changed to XX days

Confinement Benefit Deductible (Elimination Period) changed to XX days

Covered Care Deductible (Elimination Period) changed to XX days

Deductible Period to XX days

Benefit Increase Option

Benefit Increase Option – Thru Age 85

Do you have this Option? Changed to XXX (Yes/No) if Yes Simple Increase

Benefit Increase Option

Do you have this Option? Changed to XXX (Yes/No) if Yes Simple Increase

Home Care Benefit Rider Increase Option – Thru Age 85

Do you have this Option? Changed to XXX (Yes/No) if Yes Simple Increase

Home and Community Care Rider Benefit Increase Option

Do you have this Option? Changed to XXX (Yes/No) if Yes Simple Increase

Benefit Increase Option

Do you have this Option? Changed to XXX (Yes/No), if Yes, Simple BIO paragraphs will follow (SIMPLE 5% BENEFIT INCREASES: Your applicable Facility Care and Home and Community Care Daily Maximum Benefit Amounts will increase on each anniversary of the Policy Date. Increases will apply to expenses You incur on or after the date of the increase. The first increase, and each increase thereafter, will be equal to 5% of Your original Facility Care and Home and Community Care Daily Maximum Benefit Amounts. Your Lifetime Maximum Benefit Amount will also increase on each anniversary of the Policy Date. It will be increased by an amount equal to (a) times (b), where:
(a) is the remaining amount of the Maximum Lifetime Benefit Amount before the increase; and
(b) is the percent of increase in the Facility Care Daily Maximum Benefit Amount from the previous year to the current year)

Optional Home Care Rider

Optional Home Care Rider is eliminated

Optional Nonforfeiture Benefit Rider

Optional Nonforfeiture Benefit Rider is eliminated

Exercised Nonforfeiture Option

Because you purchased a nonforfeiture benefit rider with the above-referenced policy and you have chosen to stop paying premiums, you are entitled to reduced paid-up coverage. This coverage is effective <EFFECTDATE>. Your premium due going forward will be \$0.00.

Your Reduced Lifetime Benefit is \$<RLBL>, which represents the sum of all premiums you have paid for this policy, subject to a minimum of 30 times your policy's current nursing home daily benefit amount if you paid premiums for at least three full years. Once total benefits paid on your policy after <EFFECTDATE> reach this reduced maximum lifetime benefit limit, no additional benefits are payable. In addition, the sum of all benefits paid before and after <EFFECTDATE> will not exceed the maximum benefits which would have been payable if your policy had remained in premium paying status. Your Benefit Increase Option, if applicable, will continue to apply to the Daily Benefit Amount but will not apply to the Reduced Lifetime Benefit. All other features of your policy and any riders, including daily benefit limits and deductible (elimination) periods, continue to apply.

Exercised Contingent Benefit Upon Lapse

Because you have chosen to stop paying premiums on the above-referenced policy within 120 days after the effective date of a substantial premium rate increase, you are entitled to reduced paid-up coverage. This coverage is effective <EFFECTDATE>. Your premium due going forward will be \$0.00.

Your Reduced Lifetime Benefit is \$<RLBL>, which represents the sum of all premiums you have paid for this policy, subject to a minimum of 30 times your policy's current nursing home daily benefit amount. Once total benefits paid on your policy after <EFFECTDATE> reach this reduced maximum lifetime benefit limit, no additional benefits are payable. In addition, the sum of all benefits paid before and after <EFFECTDATE> will not exceed the maximum benefits which would have been payable if your policy had remained in premium paying status. Your Benefit Increase Option, if applicable, will continue to apply to the Daily Benefit Amount but will not apply to the Reduced Lifetime Benefit. All other features of your policy and any riders, including daily benefit limits and deductible (elimination) periods, continue to apply.

This endorsement does not alter any other existing conditions, limitations of the coverage by the policy to which it is attached.

This endorsement is effective [xx/xx/xxxx].

RiverSource Life Insurance Company



Secretary

Long-Term Care Coverage Change Request Form

[October 11, 2012]

[9100-2400000-7 004]

[V John Doe
ADDRESS Line 1>
City, VA 99999-9999]

Dear [V John Doe:]

You have options to modify your existing coverage to offset the upcoming premium increase on your policy. If you want to elect one of these options, please indicate your choice in the space provided below and return this form in the enclosed postage-paid envelope to:

[RiverSource Life Insurance Company
70100 Ameriprise Financial Center
P.O. Box 10
Minneapolis, MN 55440-8902]

If you decide to modify your coverage at this time

Please complete this Long-Term Care Coverage Change Request Form and return it to us. We must receive this form from you no later than [July 15, 2012] to ensure your requested changes are processed before [August 15, 2012], when the premium increase for your policy takes effect.

If your Long-Term Care Coverage Change Request Form is not received before [July 15, 2012], your requested changes may not be processed before the date on which the increased premium is due. You are responsible for paying the full increased premium until your requested benefit change is processed. If a benefit change is processed after the increased premium due date and you paid the premium, you will receive a refund for any overpaid premium.

Because your long-term care policy represents an important piece of a sound financial plan, we urge you to consider these options carefully. Please keep in mind that if you reduce your benefits, you cannot increase them in the future.

Your options

Please indicate your choice by checking one of the options below:

☐ Reduce my current daily benefit amount from [\$125.00] to [\$109.00] which will result in a [annual] premium of [\$2,862.58] beginning with the premium payment that is due [August 15, 2012]. I understand that my policy may contain other benefit amounts that will decrease proportionally if I reduce my daily benefit amount.

[Your Home Care coverage and premium will remain unchanged.]

[The Benefit Increase Option on your policy remains intact and will result in an increase of [\$6.25] in your daily benefit amount in one year.]

291524-VA

The Benefit Increase Option on your policy of 5% per year will remain intact and will continue to increase your daily benefit amount annually.

☐ Because I purchased the Nonforfeiture Benefit Rider, I want to stop paying premiums and have a reduced lifetime benefit, as described in my policy.

☐ Because I am eligible for a contingent nonforfeiture benefit upon lapse, I want to stop paying premiums and have a reduced lifetime benefit equal to the greater of (1) 100% of the sum of all premiums paid over the life of the policy, and (2) 30 times my policy's current nursing home daily benefit amount.

☐ Please make the following change(s) to my policy:

You will receive a new policy schedule after these changes are processed.

Signature of Policyholder

Date

For more information or assistance, please contact:

- > your financial advisor, <Advisor Name>, at (999) 000-9999
- > an Ameriprise Financial client service representative at 1 (866) 863-9497,

We value you as a client and look forward to continuing to serve you.

Sincerely,

RiverSource Life Insurance Company

12345 Advisor Name

Insurance and annuity products are issued by RiverSource Life Insurance Company, an affiliate of Ameriprise Financial Services, Inc.

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291524-VA

**Frequently Asked Questions for RiverSource Life Insurance Company (RiverSource Life)
and RiverSource Life Insurance Co. of New York (RiverSource Life of NY)
In-Force Long-Term Care Policyowners Affected by the Recent Rate Increase**

Q1: Is this a bill?

A: No, this notice is not a bill. This notice does provide important information regarding your upcoming Long Term Care premiums.

Q2: Why are my premiums going up?

A: Premiums are going up on the block of policies similar to yours due to anticipated claims that are higher than expected. It is important that premiums collected by an insurance company bear a relationship to the claims it anticipates paying.

Q3: Are my rates going up because I filed a claim?

A: No. In analyzing the need for a rate increase, claims information is reviewed in aggregate. In other words, we look at the claims experience across all policies like yours. This rate increase in no way reflects on any individual claims you may have submitted.

Q4: But my policy says it is “guaranteed renewable.” How can my rates be going up?

A: A policy that is guaranteed renewable means that it cannot be canceled because of a change in your health. It also means that rates can only be changed on your policy if they are changed for all other policies like yours. As long as you pay the premium, it cannot be canceled.

Q5: How do I know that this increase is justified?

A: Insurance is a heavily regulated industry. In order to implement this rate increase, RiverSource Life is required to file a request for approval with each state insurance regulatory authority. RiverSource Life of NY is required to file a request for approval with the State of New York. Included with our request is the necessary actuarial data to support the increase. If the state insurance regulatory authority agrees with our request, it is then approved and implemented. RiverSource Life and RiverSource Life of NY have filed their requests for an increase. (Note: There are a handful of states that are not empowered to actually approve a rate increase. However, RiverSource Life and RiverSource Life of NY still provided these states with the same information concerning our need to increase rates for informational purposes.)

Q6: Will my rates go up again in the future?

A: Future rate increases are possible on all guaranteed renewable long-term care insurance policies no matter which company issued the policy. However, as indicated above, any future rate increase will require state regulatory approval before it can be implemented. It is possible that you will see additional rate increases in the future.

Q7: You indicate that there are options available to me to offset this premium increase. What do you mean by that?

A: At the time you purchased your policy you were presented with several options regarding the exact nature of your benefits under the policy. Your selection of options determined the initial premium that was charged for your policy. In light of this rate increase, you may wish to revisit those options and make an adjustment to your current benefit selections. Doing so could help you lower your premium to a point that it would be comparable to the premium you were paying before the rate increase.

Q8: What options are available to me to offset this premium increase?

A: Each block of long-term care insurance policies which RiverSource Life or RiverSource Life of NY sold had different benefit options. Depending on the option(s) you may have chosen when you purchased your policy, you may want to consider a different option. Listed below are options that may be available to you. You will want to refer to your policy for the specific options that are available to you.

1. Current Daily Benefit Amount: This dollar amount represents the maximum daily benefit we will pay according to your policy. Reducing this amount will reduce the amount that we will pay for covered services received and the premium charged for your policy. Keep in mind that your policy may contain other benefit amounts that will be proportionally decreased if you reduce your daily benefit amount.
2. Elimination Period: This is the number of days that covered services are provided to you but which must be paid for by you before the policy begins to pay benefits. For example, if your policy has a 20-day elimination period, you must be receiving covered services for 20 days before we start paying benefits for services received on or after the 21st day. Increasing the elimination period will reduce your premium.
3. Benefit Period: This is the total period of time for which benefits will be paid during the life of the policy. This period is specified on your policy schedule. Reducing the benefit period will reduce your premium. For example, you may want to consider reducing your benefit period from lifetime to four years.
4. Home Care Coverage: If you have home care coverage, you may be able to reduce these benefits.

Q9: Should I let my policy lapse?

A: Your policy represents a critical component of a sound financial plan. You should always consider one of the options available to reduce your premium before you let this coverage lapse. Please consult with your advisor or a RiverSource client service representative before making changes to your policy.

Q10: Will I get a refund if I cancel my policy or let my policy lapse?

A: No. Much like other types of insurance (i.e. automobile, homeowners, etc.), your policy does not accumulate any cash value so canceling your policy or letting it lapse will not result in any refund to you. If you cancel your policy, the only refund you will receive is a return of any unearned premium that you may have already paid for the period of time between the time you cancel your policy and your next premium due date. You will not be able to receive any refund of premium that has already been earned by the company.

Q11: Wouldn't it be cheaper for me to get a new policy?

A: It may or it may not. It's important to keep in mind that obtaining a new policy with any carrier will require your application to be underwritten at your current age and at your current health status. Also, as many carriers have also experienced rate increases on existing blocks of long-term care policies, they are increasing the premiums they charge for new policies as well. If you choose to explore the possibility of obtaining a new policy elsewhere, we believe you will find that your existing policy, even with this premium increase, represents a good value compared with obtaining new coverage at current market rates. *If you are considering a new policy, be sure you have an offer of insurance for the new policy before you drop your existing coverage. If you don't pay the increased premium on your existing policy, your policy will lapse.*

Q12: Do I have to do anything if I want to keep my benefits the way they are?

A: No. As long as you continue to pay your premiums, now at the increased rate, when they are due, your policy will remain as it was prior to the rate increase. You only need to take action if you would like to explore the options available to you for reducing your benefits to offset the rate increase.

Q13: My premium is paid by a credit card or a bank authorization. I'd like to keep my current coverage; what will happen to my premium?

A: If your premium is currently being paid by a credit card or a bank authorization, the deduction amount will automatically be increased to the new premium amount. You don't need to take any action.

Q14: My premium is paid by a systematic payout from another Ameriprise account. I'd like to keep my current coverage; what will happen to my premium?

A: If your premium is currently being paid by a systematic payout from another Ameriprise account, you may need to take action:

- **If taxes are not being withheld**, the payout amount will automatically be increased to the new premium amount. You don't need to take any action.
- **If taxes are being withheld**, the gross payout amount may need to be adjusted. Contact your financial advisor or call us at our service center for more information.

Not all policies are available in all states.

Issued by RiverSource Life Insurance Company, Minneapolis, Minnesota, and in New York only, by RiverSource Life Insurance Co. of New York, Albany, New York. Variable products are distributed by RiverSource Distributors, Inc., member FINRA. These companies are affiliated with Ameriprise Financial, Inc.

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milliman.com

August 2, 2017

To: Virginia Bureau of Insurance

RE: RiverSource Life Insurance Company
Company NAIC # 65005
SERFF Tracking # AERS-131005512
Policy Form: Long Term Care Policy Form 30160A-VA
Long Term Care Insurance Endorsement Form 32100

Ameriprise Financial, Inc., the parent company of RiverSource Life Insurance Company ("RiverSource Life"), formerly IDS Life Insurance Company, has entered into a service agreement with Milliman, Inc. ("Milliman") effective April 5, 2007, that includes individual long term care rate filing services.

RiverSource Life prepared and submitted the above referenced rate filing in August 2017. Milliman has conducted a high-level review of the cover letter, Rate Review Requirements Checklist, Long Term Care Insurance Rate Request Summary, and actuarial memorandum items of this filing and believes them to be in compliance with the applicable laws of this state as indicated in the filing. However, Milliman has not performed any technical checking of the filing for accuracy.

I, Amy Pahl, am a Principal and Consulting Actuary for Milliman, Inc. I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render an actuarial opinion as described herein.

Should you have any questions regarding the above, please feel free to contact me directly at (952) 820-2419 or by email at amy.pahl@milliman.com.

Respectfully,

A handwritten signature in blue ink that reads 'Amy Pahl'.

Amy Pahl, FSA, MAAA
Principal and Consulting Actuary

AP/mag

August 2, 2017

Honorable Jacqueline K. Cunningham
Commissioner of Insurance
Virginia Bureau of Insurance

Via SERFF

RE: RiverSource Life Insurance Company ("RiverSource Life")
Company NAIC # 65005
Company FEIN # 41-0823832
SERFF Tracking # AERS-131005512
Policy Form: Long Term Care Policy Form 30160A-VA
Long Term Care Insurance Endorsement Form 32100

Dear Commissioner Cunningham:

The referenced rate filing is being submitted by RiverSource Life Insurance Company (previously IDS Life Insurance Company) for your review.

30160A-VA, subject to endorsement form 32100, is an existing individual policy form providing benefits for confinement in a nursing home with home care services and was previously approved in 2000. The form, with endorsement, was introduced for all policies with application date May 19, 2000 and later and was issued in Virginia from July 2000 through June 2003, and is no longer being marketed in any state and, outside of Virginia, was last issued in 2003. This rate filing does not apply to policies without the endorsement.

The company is requesting the approval of a premium rate increase of 32.3% on the above-listed form and all associated riders for policies issued in Virginia with endorsement form 32100. Although a larger premium rate increase is currently supportable, to minimize the impact on policyholders to the extent we can, an increase of only 32.3% is being requested at this time. Unless emerging experience improves, we believe it likely that additional premium rate increases will be requested in the future.

As noted in the Actuarial Memorandum, three prior premium rate increases have been approved and implemented on this form issued with endorsement. A 10% increase was approved in June 2007 and implemented on each contract's next policy anniversary beginning in September 2007. A 10% increase was approved in November 2011 (SERFF Tracking #AERS-126909943) and implemented on each contract's next policy anniversary beginning in March 2012. A 10% increase was approved in December 2014 (SERFF Tracking #AERS-129009910) and implemented on each contract's next policy anniversary beginning in June 2015.

As with the prior rate increases, the company will offer insureds affected by the premium increase the option of reducing their policy benefit to provide flexibility of choice for those insureds who wish to maintain a premium level reasonably similar to what they were paying prior to the rate increase.

In accordance with the NAIC Model Bulletin for Alternative Filing Requirements for Long-Term Care Premium Rate Increases, as adopted by the NAIC on December 18, 2013, if the requested premium rate increase is approved, the company will offer insureds a contingent benefit upon lapse in accordance with the duration and trigger percentages referenced in the Bulletin, regardless of the issue date of the policy.

The following electronic items are included in this submission:

- this cover letter;
- the Virginia Rate Revision Checklist;
- the Virginia Rate Request Summary;
- a letter from Milliman Inc. describing their involvement and review of this filing;
- an Actuarial Memorandum and Rate Schedules ;
- Virginia Forms 112018 and 112016 Notice of Premium Rate Increase, Virginia LTC Coverage Change Request Form 291524 and the FAQ¹ that will be sent to policyholders approximately 90 days prior to the effective date of the premium rate increase; and
- Virginia endorsement form 112459 that will be provided if the policyholder makes any changes to the benefit provisions of the policy.

¹ In the future, slight variations in language in the FAQ may occur that do not materially change the information being provided to the policyholder.

Thank you for your assistance in reviewing this filing.

Respectfully,



Anju Gupta-Lavey, FSA, MAAA
Director – Actuary
RiverSource Life Insurance Company

July 12, 2018

Ms. Janet Houser
Virginia Bureau of Insurance

Via SERFF

RE: RiverSource Life Insurance Company ("RiverSource Life")
Company NAIC # 65005
Company FEIN # 41-0823832
SERFF Tracking # AERS-131005512
Policy Form: Long Term Care Policy Form 30160A-VA
Long Term Care Insurance Endorsement Form 32100

Dear Ms. Houser:

Thank you for reviewing our filing. This letter is in response to your letter dated August 11, 2017 regarding information needed for the above-referenced filing. The remainder of this letter provides the additional information requested in your letter. I restate your requests in italics for reference.

In response to item #9 of Objection 3, a revised Actuarial Memorandum is being provided with this response where the loss ratios in Exhibits IX, X, XII and XIII and Table 1 shown in section 14 have been calculated using an interest rate of 4.50%, which is the average maximum statutory valuation interest rate used for contract reserves determined by weighting the active life reserve balance as of December 31, 2016 by issue year. The loss ratios in Attachments 1, 2 and 3 to this response (as described below) have also been calculated using an interest rate of 4.50%.

RiverSource Life is requesting a premium rate increase at this time that is lower than the current actuarially justified increase. We believe that it appropriate to limit the current premium rate increase request to 32.3% in order to minimize the impact on policyholders to the extent that we can, with the understanding that the company anticipates seeking additional premium rate increases in the future, even if experience does not deteriorate from current best estimates. However, if the Bureau's position is to only allow future additional premium rate increases if experience deteriorates from current best estimates, we request that the Bureau informs the company prior to approving this filing, as the company would like to amend this filing to request a significantly larger premium rate increase at this time.

Objection 1

According to the revised Actuarial Memorandum, this filing applies to form 30160A -VA with the endorsement 32100. Since rates would be tied to the policy and not specific to the endorsement, please revise the Affected Form Numbers in line one of the Rate/Rule Schedule to reflect 30160A-VA, 32100 and remove line item 2.

The premium rates in this filing are applicable to policy form 30160A-VA **only** when it issued with endorsement form 32100, and there is a different set of premium rates for policy form 30160A-VA with it issued without endorsement (premium rates were approved April 6, 2017, SERFF Tracking Number AERS-129718202). Therefore, we feel it is appropriate to include both the policy form and endorsement form on the Rate/Rule Schedule of SERFF.

The premium rider form 30165A indicates a previous rate increase was approved under SERFF filing AERS-127792983. That filing also included form 30160A-VA without the endorsement. In regards to the policy with endorsement, the company provided the following explanation: "For applications received May 19, 2000 and later, policies were issued with a different set of rates and endorsement 32100, which changed the benefit trigger from 2 of 5 activities of daily living to 2 of 6 (bathing added as the sixth), provided for waiver of premium while receiving home care and allowed for a 20% spousal premium discount". And as noted in this filing, this increase only applies to 30160A-VA with the endorsement 32100.

There is some confusion, however, regarding the rates approved under the prior filing for 30165A. The rate attachments approved for both the rider and the policy reflect the same rates. Please clarify the following:

- 1) *Are the rider rates a percentage factor of the base rates or separate dollar rates?*

Form 30165A is a Nonforfeiture Benefit Rider and is the only rider associated with policy form 30160A-VA, issued both with and without endorsement form 32100. The premium for this rider will be equal to a percentage of the premium of the underlying policy with any rate increase, where the percentage rate is the same as at the time the policy was originally issued.

- 2) *If dollar rates, did the premium actually increase 13% or were the rates actually factors applied to the base rate? Did the factors change at that time or stay the same?*

As described in item #1 above, the premium for the rider factors is equal to a percentage of the premium of the underlying policy. The percentage factors for form 30165A have not changed since the rider was originally approved.

- 3) *When the rates for 30165A were approved under the prior filing, it appears this increase would have only been applicable to those 30160A-VA policies without the endorsement. Is that correct or was the rate increase to the rider applicable regardless if the policy did or did not have the endorsement attached?*

As described in item #2, the percentage factors for form 30165A have not changed since the rider was originally approved, therefore there was no explicit rate increase for rider form 30165A.

- 4) *The company has currently attached factors for 30165A in this filing. What were the factors before this rate increase? And how does this differ from the factors or rates for those policies without the endorsement? If the factors or rates are different depending upon if the endorsement is attached or not, please provide both sets of rates.*

As described in item #2, the percentage factors for form 30165A have not changed since the rider was originally approved, therefore there was no explicit rate increase for rider form 30165A.

Objection 2

- 1) *Please update the Company Rate Information on the Rate/Rule Schedule to reflect the Overall Percentage Rate Impact and update the Percent Rate Change Request under the Rate Action Information to reflect the same percentage which is the percentage increase being requested at this time and not the previously approved increase.*

The "Percent Rate Change Request" field on the Rate/Rule Schedule of SERFF has been updated to reflect the currently requested 32.3% premium rate increase. The "Overall Percentage Rate Impact" field has been updated to reflect a 32.2% premium rate increase, as described in item #2.

- 2) *According to the Cover Letter, the proposed increase is 32.3% on the base policy and all associated riders for form 30160A-VA with the 32100 endorsement. There is a range of 0% - 32.3% noted on the Rate/Rule Schedule. this is confirmed by Exhibit XIV which demonstrates a range of 0% - 32.3% with a premium cap of \$998.98 resulting no increases for some individuals. Since there is a range, the expectation is that the Overall Percentage rate impact and the proposed rate increase should fall between 0% - 32.3%. Please amend the filing accordingly.*

Of the 1,535 Virginia policyholders in force as of December 31, 2016, there is only one policyholder who has a proposed premium rate with an increase less than the requested 32.3%. Therefore, the "Overall Percentage Rate Impact" for this filing is 32.2%. The Rate/Rule Schedule of SERFF has been updated to reflect this.

- 3) *There are two options included in the rate sheets: simple benefit increase option and compound benefit increase option. Are the premiums for these benefits a dollar amount or a percentage of the base policy? If these are form numbers separate from the base policy, please add the form numbers to the Rate/Rule Schedule and attach a factor or premium rate table for each. If not, please amend the rate attachment to indicate what those factors are on the premium attachment for the base policy.*

At the time of original pricing, the premium rates for policies with the Simple Benefit Increase Option ("Simple BIO") and the Compound Benefit Increase Option ("Compound BIO") were

determined separately from those for policies with No Benefit Increase Option ("No BIO"). The cumulative premium rate increase previously approved in Virginia for the policy form 30160A-VA issued with endorsement form 32100 has been applied uniformly to all premium rates regardless of the BIO (subject to a maximum premium rate cap of \$999.98). All premium rates shown in Exhibits XIV and XV of the revised Actuarial Memorandum are per \$10 of Original Daily Benefit Amount. There is no separate form number for policies with a Simple or Compound BIO, i.e. there is no "base policy" as referenced in the Bureau's objection.

- 4) *Are there any other riders that would be affected by this rate increase? If so, please add the form number exactly as approved with a corresponding rate schedule.*

Optional nonforfeiture benefit rider form 30165A was the only rider offered with this policy form issued with endorsement at the time of issue.

- 5) *Please update the Rate Request Summary for consistency with the affected form numbers and rate information on page 1.*

The Rate Request Summary has been updated to reflect the "Average Requested Percentage Rate Change Per Member" and "Average Annual Premium Member" to be consistent with the change to be consistent with the change to the "Overall Percentage Rate Impact" in SERFF, as described in item #2 above.

Objection 3

Please provide the following:

- 1) *Re-state the nationwide experience using Virginia approved rates.*

Attachment 1 to this response provides the nationwide actual historical and projected future earned premiums and incurred claims based on actual policies in force as of December 31, 2016 where actual and projected premiums have been restated to reflect the cumulative 33.1% premium rate increase as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis. Note that the loss ratios in before and after the requested premium rate increase in Attachment 1 correspond to the incurred loss ratios shown in Exhibit IX of the revised Actuarial Memorandum provided with this response.

- 2) *Provide a separate calculation of the Lifetime Loss Ratio so that the historical premium component is restated to what it would be if the proposed premium had been charged (collected) since the forms introduction.*

Attachment 2 to this response provides the nationwide experience assuming the proposed Virginia premium rate level (i.e. with cumulative 76% rate increase) from inception, and Attachment 3 provides corresponding information for Virginia-specific experience.

- 3) *Please provide sufficient detail or documentation provided so that any projections can be recreated. Please provide a copy of all projections in Excel with working formulas.*

A Microsoft Excel workbook with Exhibits IX and X of the revised Actuarial Memorandum and a Microsoft Excel workbook with Attachments 1, 2, 3, 5, 6 and 7 of this letter have been provided with this response. Note that the projected policies in force, earned premiums, paid claims and incurred claims in these exhibits and attachments are a summary of the seriatim-level results projected on a seriatim basis using an external projection model and are therefore hard-coded numbers in the Microsoft Excel workbooks. The formulas used for determining the loss ratios before and after interest are intact in this file.

The following provides a description of the projected experience provided in Exhibits IX and X and Attachments 1 through 3. The projected experience provided in Attachments 5 and 6 is described in item #5 below, and a description of the experience provided in Attachment 7 is provided in item #6 below.

Starting with actual business in force as of December 31, 2016, we project each policy on a seriatim basis in Exhibits IX and X and Attachments 1 through 3, using the current premium rate increase assumptions as described in section 5 of the revised Actuarial Memorandum.

The actual and projected earned premiums in Exhibit IX and Attachment 1 reflect the cumulative 33.1% premium rate increase as approved in Virginia and implemented from 2007 through 2016

on a nationwide basis. The actual and projected earned premiums in Attachments 2 and 3 have been adjusted to reflect the cumulative 76% proposed premium rate increase from inception, as described in item #2 of Objection 3 above.

The projected paid and incurred claims in Exhibits IX and X and Attachments 1 through 3 are based on the actual benefit provisions in force at the time of projection. Claims and deaths are assumed to occur on a monthly basis, while lapses are assumed to occur on policy anniversaries.

- 4) *Advise in what states the company has requested rate increases on this block, how the rate changes requested in Virginia compare with those requested in other states, and the current status of the reviews in other states.*

Attachment 4 to this response provides a list of the forty-eight jurisdictions (including the District of Columbia) where policy form series 30160A issued with endorsement was offered with the status of all currently requested premium rate increases as of July 12, 2018 and the history of all previous rate revisions which first began in 2007. As this attachment shows:

- the cumulative 76% premium rate increase currently requested in Virginia has been approved in twenty-three states;
- we have requests pending in Illinois, Louisiana and Texas to bring premium rate increases in these states to the cumulative 76% currently requested in Virginia;
- we will be requesting the following premium rate increases to bring cumulative premium rate increases in these states to the cumulative 76% currently requested in Virginia:
 - Colorado, Georgia, Idaho, Indiana, Maine, Maryland, Minnesota, New Hampshire, Ohio and Oregon in 2018; and
 - Massachusetts, Montana, New Mexico, Oklahoma and Rhode Island in 2019;
- we have requests pending in Hawaii and Vermont for a 40% premium rate increase, will be requesting a premium rate increase in the District of Columbia in 2018 and in Arkansas and Connecticut in 2019 to move the cumulative premium rate increase in these states towards the cumulative 76% currently requested in Virginia; and
- no additional premium rate increases are being requested in Florida at this time.

- 5) *Please provide a loss ratio projection reflecting the actual historical experience during the historical experience period and then, utilizing the actual in force as of the projection date, projecting forward the expected earned premiums and incurred claims using the original pricing assumptions for interest, mortality, morbidity and persistency into the future and assuming the future premiums are paid based on the original premium scale as if no increases had ever been implemented.*

Attachments 5 and 6 to this response provide two different versions of loss ratio projections for nationwide experience in accordance with this response, where the historical experience from January 1, 2000 through December 31, 2016 differs as follows:

- historical earned premiums in Attachment 5 have been restated to the original Virginia premium level (i.e. before any rate increases); and
- historical earned premiums in Attachment 6 have been restated to reflect the cumulative 33.1% premium rate increase as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis (i.e. the same as Exhibit IX of the revised Actuarial Memorandum and Attachment 1 of this response).

The projected earned premiums in both attachments are based on policies in force as of December 31, 2016, restated to the original Virginia premium level (i.e. before any premium rate increases), and future experience for earned premiums and incurred claims are projected using all original pricing assumptions for morbidity, mortality and lapse. The average maximum valuation rate of 4.5% is used to accumulate historical experience to the valuation date, and the original pricing interest rate of 5.0% is used to discount projected future experience in both attachments.

- 6) *Please provide a loss ratio projection (both past and future) which reflects all of the original pricing assumptions for interest, mortality, morbidity, persistency and premium scale, but uses the actual distribution of policies as issued rather than the originally assumed mix of business.*

Attachment 7 to this response provides the developed of the nationwide expected lifetime loss ratio for policy form series 30160A issued with endorsement, where expected experience has

- been developed using the distribution of business actually sold projected from issue using all original pricing assumptions.
- 7) *Please provide the reserve basis and justification for the reserve levels provided.*

Attachment 8 to this response provides the active life reserve (“ALR”) balances for nationwide and Virginia experience as of December 31st for calendar years 2000 through 2016.

The valuation bases used to develop the ALR for this block of business vary by issue year. The reserve methods and assumptions used to calculate the ALR prior to September 30, 2011 are shown in the following Table 1:

Table 1 Active Life Statutory Reserve Assumptions For Reserve Calculations Prior to September 30, 2011						
Issue Year	Interest Rate	Reserve Method	Mortality Table	Lapse Rate	Morbidity Basis	Morbidity Load
2000 - 2003	4.5%	1-Year FPT	GAP 83a	2.0%	Original Pricing	1.05

- Beginning September 30, 2011 and with the permission of the Minnesota Department of Commerce, we revised the statutory valuation bases to:
- move interest rates and mortality rates to the minimum statutory requirements
 - create consistency in lapse assumptions and valuation methods; and
 - update morbidity assumptions to reflect recent company experience.

The reserve method and assumptions used to calculate the ALR on or after September 30, 2011 are shown in the following Table 2:

Table 2 Active Life Statutory Reserve Assumptions For Reserve Calculations On or After September 30, 2011						
Issue Year	Interest Rate	Reserve Method	Mortality Table	Lapse Rate	Morbidity Basis	Morbidity Load
2000 – 2003	4.5%	1-Year FPT	GAM 83a	2010 Best Estimate Capped at 4% ¹	2010 Best Estimate	1.00

¹ Lapse assumption is 80% of 2010 best estimate for durations 1-4, capped at 4% for durations 5+

The company performs asset adequacy analysis in aggregate for our inforce long-term care block of business every year, and, if indicated, holds additional asset adequacy analysis reserves. Note that the additional asset adequacy analysis reserve balances are not included in Attachment.

- 8) *If this increase is approved and experience develops as anticipated, will the company forgo increases in the future? If not, what would trigger a rate increase in the future? In other words, what targeted loss ratio does the company plans to manage this block in the future?*

As described in the cover letter provided with the initial submission, a premium rate increase that is much larger than the currently requested 32.3% increase is strongly actuarially justified and supportable at this time. Table 3 shows the isolated impact on the projected lifetime incurred loss ratio of future deviations in each key driver from original assumptions and the corresponding premium rate increase needed to produce a lifetime incurred loss ratio of 68.9%, which represents the lifetime incurred loss ratio using historical experience combined with projections based on our original pricing assumptions.

The lifetime incurred loss ratios in the table below reflect actual historical experience (i.e. only the projection period assumptions vary). Note that Table 3 has been developed using nationwide historical experience through December 31, 2016, where actual and projected premiums reflect the accumulated premium rate increases as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis, and the lifetime incurred loss ratio with all current assumptions corresponds to Exhibit IX of the revised Actuarial Memorandum and



Attachment 1 to this response before the requested premium rate increase. Note that the information shown in Table 3 below is also provided in Table 1 in section 14 of the revised Actuarial Memorandum.

Table 3
RiverSource Life Insurance Company
Impact on Lifetime Incurred Loss Ratio of
Changing from Original Pricing to Current Assumptions
Nationwide Experience Before Premium Rate Increase
Adjusted for Cumulative Prior Approved Premium Rate Increases on a Nationwide Basis
Policy Form 30160A, Subject to Endorsement Form 32100

Assumptions	Lifetime Incurred Ratio	Impact on Lifetime Incurred 68.9%	Increase Needed to Produce a Lifetime Incurred Loss Ratio of 68.9%
Historical Experience through 12/31/2016 and Projections with Original Pricing Assumptions	68.9%	N/A	N/A
Historical Experience through 12/31/2016 and Projections with Original Pricing Assumptions except for Current:			
Morbidity	68.0%	-0.9%	-5.6%
Mortality	71.3%	2.4%	15.7%
Lapse	89.5%	20.6%	113.5%
Interest	72.6%	3.7%	23.7%
Historical Experience through 12/31/2016 and Projections with All Current Assumptions	97.9%	29.0%	146.6%

Note that the lifetime loss ratio for each changed assumption in Table 3 does not reflect any synergy of the assumptions. As a result, the total impact of all current assumptions on the lifetime loss ratio (i.e. 29.0%) is greater than the sum of each changed assumption’s impact on the lifetime loss ratio (i.e. 25.8% = -0.9% + 2.4% + 20.6% + 3.7%).

As demonstrated in Table 3, the current actuarially justified premium rate increase far exceeds the 32.3% premium rate increase that we are requesting at this time. As described at the beginning of this letter, the company believes it is appropriate to limit the current premium rate increase request to 32.3% to minimize the impact on policyholders to the extent we can, with the understanding that the company anticipates seeking additional premium rate increases in the future, even if experience does not deteriorate from current best estimates.

While the company currently has no formal plan to seek additional nationwide premium rate increases on policy form series 30160A issued with endorsement, we believe that two (or possibly more) additional 15% premium rate increases would likely be requested in the future beyond the level currently requested in this filing, even if current best estimates for key assumptions are realized in future years. If experience deteriorates from the current best estimates used in this filing, we might pursue additional premium rate increases beyond that level.

- 9) *Please note for pre-stability policies, as set forth in 14VAC5-200-150 B, notwithstanding the provision of 14VAC5-130-50 with regard to interest, demonstrations of loss ratios shall be made in compliance with the Rules Governing the Filing of Rates for all Individual and Certain Group Accident and Sickness Insurance Policy Forms (14VAC5-130). All present and accumulated values used to determine rate increases, including the lifetime loss ratio used in the original pricing, shall use the maximum interest rate for contract reserves as specified in Section 38.2-1371 of the Code of Virginia. Please provide updated exhibits if appropriate.*

As described above, Actuarial Memorandum Exhibits IX, X, XII and XIII and Table 1 shown in section 14 of the revised Actuarial Memorandum have been updated to use an interest rate of 4.50%, which is the average maximum statutory valuation interest rate used for contract reserves determined by weighting the active life reserve balance as of December 31, 2016 by issue year, to accumulate historical experience and discount projected future experience in the determination of the loss ratios. The loss ratios shown in Attachments 1, 2 and 3 and Table 3 of

this response use the 4.50% interest rate to accumulate historical experience and discount projected future experience, and the loss ratios shown in Attachments 5 and 6 use the 4.50% interest rate to accumulate historical experience only.

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Ms. Houser, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at anju.x.gupta-lavey@ampf.com.

Respectfully,



Anju Gupta-Lavey, FSA, MAAA
Director – Actuary
RiverSource Life Insurance Company

- Attachment 1: Nationwide Experience Restated to Current Virginia Premium Level
- Attachment 2: Nationwide Experience with Proposed Virginia Premium Levels since Inception
- Attachment 3: Virginia Experience with Proposed Virginia Premium Levels since Inception
- Attachment 4: Status of Long-Term Care Premium Rate Increase Filings as of July 12, 2018
- Attachment 5: Nationwide Experience with Historical and Projected Experience Restated to Original Virginia Premium Levels since Inception
- Attachment 6: Nationwide Experience with Historical Experience Restated to Current Virginia Premium Level and Projected Experience Restated to Original Virginia Premium Level
- Attachment 7: Expected Lifetime Loss Ratio Based on Original Pricing Assumptions
- Attachment 8: Active Life Reserve Balances by Calendar Year
- Enclosures: Revised Rate Request Summary
Microsoft Excel Workbook with Actuarial Memorandum Exhibits
Microsoft Excel Workbook with Response Attachments

Attachment 1
RiverSource Life Insurance Company
Nationwide Experience Before Premium Rate Increase
Adjusted for Cumulative Prior Approved Premium Rate Increases on a Nationwide Basis
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio		
	2000	3,315,277	0	0.0%	6,853,913	0	0.0%	4.50%	2.0674
	2001	26,853,063	521,781	1.9%	53,124,680	1,032,264	1.9%	4.50%	1.9783
	2002	48,216,250	2,022,911	4.2%	91,280,843	3,829,685	4.2%	4.50%	1.8932
	2003	58,072,841	1,472,260	2.5%	105,206,602	2,667,193	2.5%	4.50%	1.8116
	2004	55,093,233	4,387,605	8.0%	95,510,669	7,606,435	8.0%	4.50%	1.7336
	2005	53,271,422	7,130,941	13.4%	88,375,448	11,829,984	13.4%	4.50%	1.6590
	2006	51,921,930	6,277,520	12.1%	82,427,452	9,965,731	12.1%	4.50%	1.5875
	2007	50,894,571	13,543,924	26.6%	77,317,218	20,575,446	26.6%	4.50%	1.5192
	2008	52,273,899	9,376,809	17.9%	75,992,961	13,631,497	17.9%	4.50%	1.4537
	2009	51,630,345	18,077,400	35.0%	71,825,260	25,148,272	35.0%	4.50%	1.3911
	2010	50,395,824	18,410,403	36.5%	67,088,865	24,508,638	36.5%	4.50%	1.3312
	2011	49,176,341	26,784,123	54.5%	62,646,355	34,120,629	54.5%	4.50%	1.2739
	2012	48,853,165	26,601,992	54.5%	59,554,696	32,429,292	54.5%	4.50%	1.2191
	2013	51,004,618	27,101,564	53.1%	59,499,938	31,615,596	53.1%	4.50%	1.1666
	2014	49,927,040	29,916,307	59.9%	55,734,812	33,396,327	59.9%	4.50%	1.1163
	2015	49,415,169	44,644,319	90.3%	52,787,941	47,691,462	90.3%	4.50%	1.0683
	2016	51,614,596	48,420,328	93.8%	52,763,145	49,497,797	93.8%	4.50%	1.0223
Projected Future Experience	2017	50,514,256	41,295,813	81.8%	49,414,660	40,396,885	81.8%	4.50%	0.9782
	2018	48,601,090	44,128,459	90.8%	45,495,828	41,308,966	90.8%	4.50%	0.9361
	2019	46,625,520	47,631,583	102.2%	41,766,969	42,668,197	102.2%	4.50%	0.8958
	2020	44,598,517	51,680,473	115.9%	38,230,802	44,301,605	115.9%	4.50%	0.8572
	2021	42,519,557	56,153,746	132.1%	34,879,112	46,063,340	132.1%	4.50%	0.8203
	2022	40,383,484	60,726,014	150.4%	31,700,359	47,668,905	150.4%	4.50%	0.7850
	2023	38,204,689	65,429,968	171.3%	28,698,605	49,149,694	171.3%	4.50%	0.7512
	2024	36,007,006	70,248,790	195.1%	25,883,013	50,497,127	195.1%	4.50%	0.7188
	2025	33,791,812	75,130,887	222.3%	23,244,650	51,680,898	222.3%	4.50%	0.6879
	2026	31,562,233	79,978,819	253.4%	20,776,049	52,646,588	253.4%	4.50%	0.6583
	2027	29,333,770	84,747,714	288.9%	18,477,654	53,383,487	288.9%	4.50%	0.6299
	2028	27,115,994	89,249,828	329.1%	16,345,123	53,798,485	329.1%	4.50%	0.6028
	2029	24,909,523	92,959,822	373.2%	14,368,511	53,621,833	373.2%	4.50%	0.5768
	2030	22,726,931	95,711,807	421.1%	12,545,006	52,831,823	421.1%	4.50%	0.5520
	2031	20,594,966	97,578,579	473.8%	10,878,647	51,542,832	473.8%	4.50%	0.5282
	2032	18,532,550	98,632,827	532.2%	9,367,694	49,856,178	532.2%	4.50%	0.5055
	2033	16,556,921	98,863,676	597.1%	8,008,677	47,820,924	597.1%	4.50%	0.4837
	2034	14,687,087	98,352,407	669.7%	6,798,304	45,524,996	669.7%	4.50%	0.4629
	2035	12,935,074	97,044,926	750.2%	5,729,511	42,985,448	750.2%	4.50%	0.4429
	2036	11,302,196	94,876,540	839.5%	4,790,658	40,215,287	839.5%	4.50%	0.4239
	2037	9,794,020	91,872,933	938.1%	3,972,620	37,265,215	938.1%	4.50%	0.4056
	2038	8,423,147	88,181,448	1046.9%	3,269,446	34,227,642	1046.9%	4.50%	0.3882
	2039	7,191,240	83,935,441	1167.2%	2,671,082	31,176,606	1167.2%	4.50%	0.3714
	2040	6,093,546	79,107,694	1298.2%	2,165,894	28,118,095	1298.2%	4.50%	0.3554
	2041	5,123,481	73,544,561	1435.4%	1,742,674	25,015,054	1435.4%	4.50%	0.3401
	2042	4,273,526	67,384,060	1576.8%	1,390,980	21,932,683	1576.8%	4.50%	0.3255
	2043	3,535,382	60,932,048	1723.5%	1,101,171	18,978,596	1723.5%	4.50%	0.3115
	2044	2,900,166	54,536,512	1880.5%	864,420	16,255,090	1880.5%	4.50%	0.2981
	2045	2,358,611	48,302,649	2047.9%	672,732	13,777,064	2047.9%	4.50%	0.2852
	2046	1,901,272	42,335,967	2226.7%	518,936	11,555,239	2226.7%	4.50%	0.2729
	2047	1,518,746	36,712,930	2417.3%	396,678	9,588,975	2417.3%	4.50%	0.2612
	2048	1,201,891	31,490,498	2620.1%	300,401	7,870,755	2620.1%	4.50%	0.2499
	2049	942,005	26,710,436	2835.5%	225,307	6,388,539	2835.5%	4.50%	0.2392
	2050	730,972	22,391,611	3063.3%	167,304	5,124,950	3063.3%	4.50%	0.2289
	2051	561,356	18,542,713	3303.2%	122,949	4,061,264	3303.2%	4.50%	0.2190
	2052	426,460	15,163,153	3555.6%	89,382	3,178,054	3555.6%	4.50%	0.2096
	2053	320,345	12,236,243	3819.7%	64,250	2,454,164	3819.7%	4.50%	0.2006
	2054	237,816	9,741,751	4096.3%	45,644	1,869,718	4096.3%	4.50%	0.1919
	2055	174,387	7,647,842	4385.5%	32,029	1,404,629	4385.5%	4.50%	0.1837
	2056	126,239	5,917,656	4687.7%	22,187	1,040,055	4687.7%	4.50%	0.1758
	2057	90,157	4,510,611	5003.1%	15,163	758,622	5003.1%	4.50%	0.1682
	2058	63,477	3,384,545	5332.0%	10,216	544,721	5332.0%	4.50%	0.1609
	2059	44,020	2,496,617	5671.6%	6,780	384,512	5671.6%	4.50%	0.1540
	2060	30,033	1,807,926	6019.8%	4,426	266,454	6019.8%	4.50%	0.1474
	2061	20,129	1,282,237	6370.3%	2,839	180,840	6370.3%	4.50%	0.1410
	2062	13,226	888,587	6718.3%	1,785	119,925	6718.3%	4.50%	0.1350
	2063	8,500	600,310	7062.5%	1,098	77,530	7062.5%	4.50%	0.1291
	2064	5,326	394,268	7402.4%	658	48,727	7402.4%	4.50%	0.1236
	2065	3,242	251,175	7747.2%	383	29,705	7747.2%	4.50%	0.1183
	2066	1,908	154,492	8095.3%	216	17,484	8095.3%	4.50%	0.1132
Past Future Lifetime	Past	801,929,585	284,690,187	35.5%	1,157,990,800	349,546,249	30.2%		
	Future	669,617,805	2,432,881,595	363.3%	467,279,483	1,241,674,403	265.7%		
	Lifetime	1,471,547,390	2,717,571,782	184.7%	1,625,270,283	1,591,220,652	97.9%		

Attachment 1
RiverSource Life Insurance Company
Nationwide Experience With 32.3% Premium Rate Increase
Adjusted for Cumulative Prior Approved Premium Rate Increases on a Nationwide Basis
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio		
	2000	3,315,277	0	0.0%	6,853,913	0	0.0%	4.50%	2.0674
	2001	26,853,063	521,781	1.9%	53,124,680	1,032,264	1.9%	4.50%	1.9783
	2002	48,216,250	2,022,911	4.2%	91,280,843	3,829,685	4.2%	4.50%	1.8932
	2003	58,072,841	1,472,260	2.5%	105,206,602	2,667,193	2.5%	4.50%	1.8116
	2004	55,093,233	4,387,605	8.0%	95,510,669	7,606,435	8.0%	4.50%	1.7336
	2005	53,271,422	7,130,941	13.4%	88,375,448	11,829,984	13.4%	4.50%	1.6590
	2006	51,921,930	6,277,520	12.1%	82,427,452	9,965,731	12.1%	4.50%	1.5875
	2007	50,894,571	13,543,924	26.6%	77,317,218	20,575,446	26.6%	4.50%	1.5192
	2008	52,273,899	9,376,809	17.9%	75,992,961	13,631,497	17.9%	4.50%	1.4537
	2009	51,630,345	18,077,400	35.0%	71,825,260	25,148,272	35.0%	4.50%	1.3911
	2010	50,395,824	18,410,403	36.5%	67,088,865	24,508,638	36.5%	4.50%	1.3312
	2011	49,176,341	26,784,123	54.5%	62,646,355	34,120,629	54.5%	4.50%	1.2739
	2012	48,853,165	26,601,992	54.5%	59,554,696	32,429,292	54.5%	4.50%	1.2191
	2013	51,004,618	27,101,564	53.1%	59,499,938	31,615,596	53.1%	4.50%	1.1666
	2014	49,927,040	29,916,307	59.9%	55,734,812	33,396,327	59.9%	4.50%	1.1163
	2015	49,415,169	44,644,319	90.3%	52,787,941	47,691,462	90.3%	4.50%	1.0683
	2016	51,614,596	48,420,328	93.8%	52,763,145	49,497,797	93.8%	4.50%	1.0223
Projected Future Experience	2017	51,612,622	41,211,990	79.8%	50,489,117	40,314,887	79.8%	4.50%	0.9782
	2018	58,817,679	44,273,809	75.3%	55,059,650	41,445,029	75.3%	4.50%	0.9361
	2019	58,591,597	47,642,593	81.3%	52,486,137	42,678,059	81.3%	4.50%	0.8958
	2020	56,044,716	51,159,852	91.3%	48,042,728	43,855,318	91.3%	4.50%	0.8572
	2021	53,432,527	55,013,442	103.0%	43,831,104	45,127,940	103.0%	4.50%	0.8203
	2022	50,748,530	58,876,070	116.0%	39,836,747	46,216,730	116.0%	4.50%	0.7850
	2023	48,010,788	62,783,351	130.8%	36,064,751	47,161,608	130.8%	4.50%	0.7512
	2024	45,249,263	66,836,567	147.7%	32,526,649	48,044,310	147.7%	4.50%	0.7188
	2025	42,465,693	71,317,694	167.9%	29,211,223	49,057,885	167.9%	4.50%	0.6879
	2026	39,664,003	75,884,119	191.3%	26,109,093	49,951,225	191.3%	4.50%	0.6583
	2027	36,863,678	80,374,496	218.0%	23,220,823	50,628,751	218.0%	4.50%	0.6299
	2028	34,076,750	84,611,298	248.3%	20,540,964	51,002,447	248.3%	4.50%	0.6028
	2029	31,303,991	88,097,335	281.4%	18,057,020	50,817,014	281.4%	4.50%	0.5768
	2030	28,561,206	90,676,084	317.5%	15,765,459	50,052,161	317.5%	4.50%	0.5520
	2031	25,882,012	92,417,100	357.1%	13,671,363	48,816,442	357.1%	4.50%	0.5282
	2032	23,290,201	93,389,825	401.0%	11,772,555	47,205,985	401.0%	4.50%	0.5055
	2033	20,807,438	93,584,505	449.8%	10,064,677	45,267,359	449.8%	4.50%	0.4837
	2034	18,457,610	93,078,415	504.3%	8,543,590	43,083,790	504.3%	4.50%	0.4629
	2035	16,255,842	91,820,752	564.8%	7,200,424	40,671,433	564.8%	4.50%	0.4429
	2036	14,203,783	89,750,637	631.9%	6,020,553	38,042,572	631.9%	4.50%	0.4239
	2037	12,308,427	86,892,627	706.0%	4,992,506	35,245,118	706.0%	4.50%	0.4056
	2038	10,585,615	83,386,278	787.7%	4,108,808	32,366,396	787.7%	4.50%	0.3882
	2039	9,037,444	79,357,785	878.1%	3,356,828	29,476,302	878.1%	4.50%	0.3714
	2040	7,657,939	74,781,549	976.5%	2,721,943	26,580,407	976.5%	4.50%	0.3554
	2041	6,438,831	69,512,446	1079.6%	2,190,069	23,643,592	1079.6%	4.50%	0.3401
	2042	5,370,666	63,680,954	1185.7%	1,748,086	20,727,368	1185.7%	4.50%	0.3255
	2043	4,443,018	57,576,081	1295.9%	1,383,873	17,933,308	1295.9%	4.50%	0.3115
	2044	3,644,722	51,526,518	1413.7%	1,086,342	15,357,934	1413.7%	4.50%	0.2981
	2045	2,964,134	45,631,479	1539.5%	845,442	13,015,183	1539.5%	4.50%	0.2852
	2046	2,389,383	39,990,431	1673.7%	652,161	10,915,045	1673.7%	4.50%	0.2729
	2047	1,908,651	34,675,393	1816.7%	498,517	9,056,795	1816.7%	4.50%	0.2612
	2048	1,510,449	29,739,949	1968.9%	377,523	7,433,221	1968.9%	4.50%	0.2499
	2049	1,183,844	25,223,329	2130.6%	283,149	6,032,856	2130.6%	4.50%	0.2392
	2050	918,632	21,143,157	2301.6%	210,255	4,839,206	2301.6%	4.50%	0.2289
	2051	705,471	17,507,454	2481.7%	154,514	3,834,520	2481.7%	4.50%	0.2190
	2052	535,944	14,315,502	2671.1%	112,329	3,000,394	2671.1%	4.50%	0.2096
	2053	402,586	11,551,395	2869.3%	80,745	2,316,807	2869.3%	4.50%	0.2006
	2054	298,869	9,195,904	3076.9%	57,361	1,764,955	3076.9%	4.50%	0.1919
	2055	219,157	7,218,866	3293.9%	40,251	1,325,842	3293.9%	4.50%	0.1837
	2056	158,647	5,585,399	3520.6%	27,883	981,659	3520.6%	4.50%	0.1758
	2057	113,302	4,257,118	3757.3%	19,056	715,988	3757.3%	4.50%	0.1682
	2058	79,772	3,194,169	4004.1%	12,839	514,081	4004.1%	4.50%	0.1609
	2059	55,320	2,356,071	4259.0%	8,520	362,866	4259.0%	4.50%	0.1540
	2060	37,743	1,706,070	4520.2%	5,563	251,442	4520.2%	4.50%	0.1474
	2061	25,296	1,209,946	4783.2%	3,568	170,644	4783.2%	4.50%	0.1410
	2062	16,622	838,455	5044.3%	2,243	113,159	5044.3%	4.50%	0.1350
	2063	10,682	566,421	5302.6%	1,380	73,153	5302.6%	4.50%	0.1291
	2064	6,694	371,997	5557.5%	827	45,974	5557.5%	4.50%	0.1236
	2065	4,074	236,979	5816.2%	482	28,027	5816.2%	4.50%	0.1183
	2066	2,398	145,756	6077.4%	271	16,496	6077.4%	4.50%	0.1132
	Past	801,929,585	284,690,187	35.5%	1,157,990,800	349,546,249	30.2%		
	Future	827,374,259	2,316,175,413	279.9%	573,497,960	1,187,579,682	207.1%		
	Lifetime	1,629,303,843	2,600,865,599	159.6%	1,731,488,760	1,537,125,931	88.8%		

Attachment 2
RiverSource Life Insurance Company
Nationwide Experience
Experience with Premiums Restated to Proposed Virginia Premium Level since Inception¹
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio		
	2000	5,837,914	0	0.0%	12,069,144	0	0.0%	4.50%	2.0674
	2001	47,285,907	545,642	1.2%	93,547,940	1,079,469	1.2%	4.50%	1.9783
	2002	84,904,622	2,115,417	2.5%	160,737,624	4,004,813	2.5%	4.50%	1.8932
	2003	102,261,221	1,539,585	1.5%	185,259,674	2,789,162	1.5%	4.50%	1.8116
	2004	97,014,390	4,588,247	4.7%	168,185,978	7,954,271	4.7%	4.50%	1.7336
	2005	93,806,339	7,457,033	7.9%	155,621,475	12,370,960	7.9%	4.50%	1.6590
	2006	91,430,002	6,564,586	7.2%	145,147,573	10,421,456	7.2%	4.50%	1.5875
	2007	89,620,913	14,163,276	15.8%	136,148,895	21,516,344	15.8%	4.50%	1.5192
	2008	85,234,427	9,737,713	11.4%	123,909,189	14,156,159	11.4%	4.50%	1.4537
	2009	82,619,282	18,736,612	22.7%	114,935,343	26,065,331	22.7%	4.50%	1.3911
	2010	80,643,721	19,080,340	23.7%	107,356,031	25,400,484	23.7%	4.50%	1.3312
	2011	78,692,117	27,751,329	35.3%	100,246,871	35,352,765	35.3%	4.50%	1.2739
	2012	76,816,032	27,494,056	35.8%	93,642,969	33,516,766	35.8%	4.50%	1.2191
	2013	74,671,306	27,869,089	37.3%	87,108,546	32,510,959	37.3%	4.50%	1.1666
	2014	72,644,941	30,709,479	42.3%	81,095,378	34,281,765	42.3%	4.50%	1.1163
	2015	70,648,419	45,713,674	64.7%	75,470,440	48,833,805	64.7%	4.50%	1.0683
	2016	68,709,344	48,924,995	71.2%	70,238,293	50,013,694	71.2%	4.50%	1.0223
Projected Future Experience	2017	66,830,360	42,340,044	63.4%	65,375,596	41,418,385	63.4%	4.50%	0.9782
	2018	64,299,242	45,133,141	70.2%	60,190,981	42,249,456	70.2%	4.50%	0.9361
	2019	61,685,563	48,595,426	78.8%	55,257,700	43,531,604	78.8%	4.50%	0.8958
	2020	59,003,838	52,602,413	89.2%	50,579,351	45,091,912	89.2%	4.50%	0.8572
	2021	56,253,373	57,032,710	101.4%	46,145,065	46,784,361	101.4%	4.50%	0.8203
	2022	53,427,349	61,560,821	115.2%	41,939,576	48,324,215	115.2%	4.50%	0.7850
	2023	50,544,803	66,219,735	131.0%	37,968,254	49,742,952	131.0%	4.50%	0.7512
	2024	47,637,268	70,993,126	149.0%	34,243,226	51,032,180	149.0%	4.50%	0.7188
	2025	44,706,567	75,829,431	169.6%	30,752,672	52,161,411	169.6%	4.50%	0.6879
	2026	41,756,834	80,631,274	193.1%	27,486,713	53,076,070	193.1%	4.50%	0.6583
	2027	38,808,578	85,354,101	219.9%	24,445,936	53,765,457	219.9%	4.50%	0.6299
	2028	35,874,460	89,810,370	250.3%	21,624,598	54,136,372	250.3%	4.50%	0.6028
	2029	32,955,299	93,474,751	283.6%	19,009,541	53,918,858	283.6%	4.50%	0.5768
	2030	30,067,730	96,181,619	319.9%	16,597,043	53,091,153	319.9%	4.50%	0.5520
	2031	27,247,140	98,004,318	359.7%	14,392,449	51,767,716	359.7%	4.50%	0.5282
	2032	24,518,563	99,015,932	403.8%	12,393,459	50,049,827	403.8%	4.50%	0.5055
	2033	21,904,807	99,205,941	452.9%	10,595,480	47,986,479	452.9%	4.50%	0.4837
	2034	19,431,016	98,656,019	507.7%	8,994,156	45,665,530	507.7%	4.50%	0.4629
	2035	17,113,104	97,312,320	568.6%	7,580,143	43,103,889	568.6%	4.50%	0.4429
	2036	14,952,806	95,110,179	636.1%	6,338,041	40,314,319	636.1%	4.50%	0.4239
	2037	12,957,489	92,075,395	710.6%	5,255,776	37,347,337	710.6%	4.50%	0.4056
	2038	11,143,824	88,355,572	792.9%	4,325,477	34,295,228	792.9%	4.50%	0.3882
	2039	9,514,011	84,084,098	883.8%	3,533,842	31,231,823	883.8%	4.50%	0.3714
	2040	8,061,761	79,233,660	982.8%	2,865,478	28,162,869	982.8%	4.50%	0.3554
	2041	6,778,366	73,650,474	1086.6%	2,305,557	25,051,079	1086.6%	4.50%	0.3401
	2042	5,653,875	67,472,403	1193.4%	1,840,267	21,961,438	1193.4%	4.50%	0.3255
	2043	4,677,310	61,005,132	1304.3%	1,456,849	19,001,359	1304.3%	4.50%	0.3115
	2044	3,836,919	54,596,464	1422.9%	1,143,628	16,272,959	1422.9%	4.50%	0.2981
	2045	3,120,443	48,351,406	1549.5%	890,024	13,790,971	1549.5%	4.50%	0.2852
	2046	2,515,383	42,375,270	1684.6%	686,552	11,565,966	1684.6%	4.50%	0.2729
	2047	2,009,301	36,744,325	1828.7%	524,805	9,597,175	1828.7%	4.50%	0.2612
	2048	1,590,102	31,515,343	1982.0%	397,431	7,876,965	1982.0%	4.50%	0.2499
	2049	1,246,273	26,729,909	2144.8%	298,081	6,393,196	2144.8%	4.50%	0.2392
	2050	967,076	22,406,722	2317.0%	221,343	5,128,408	2317.0%	4.50%	0.2289
	2051	742,674	18,554,317	2498.3%	162,662	4,063,806	2498.3%	4.50%	0.2190
	2052	564,207	15,171,969	2689.1%	118,252	3,179,901	2689.1%	4.50%	0.2096
	2053	423,817	12,242,865	2888.7%	85,003	2,455,492	2888.7%	4.50%	0.2006
	2054	314,630	9,746,668	3097.8%	60,386	1,870,662	3097.8%	4.50%	0.1919
	2055	230,715	7,651,446	3316.4%	42,374	1,405,291	3316.4%	4.50%	0.1837
	2056	167,014	5,920,266	3544.8%	29,353	1,040,514	3544.8%	4.50%	0.1758
	2057	119,277	4,512,475	3783.2%	20,061	758,936	3783.2%	4.50%	0.1682
	2058	83,980	3,385,857	4031.8%	13,516	544,932	4031.8%	4.50%	0.1609
	2059	58,238	2,497,527	4288.5%	8,969	384,652	4288.5%	4.50%	0.1540
	2060	39,734	1,808,547	4551.7%	5,856	266,545	4551.7%	4.50%	0.1474
	2061	26,630	1,282,653	4816.6%	3,756	180,898	4816.6%	4.50%	0.1410
	2062	17,498	888,860	5079.6%	2,362	119,962	5079.6%	4.50%	0.1350
	2063	11,245	600,486	5339.8%	1,452	77,552	5339.8%	4.50%	0.1291
	2064	7,047	394,378	5596.7%	871	48,740	5596.7%	4.50%	0.1236
	2065	4,289	251,242	5857.3%	507	29,713	5857.3%	4.50%	0.1183
	2066	2,525	154,532	6120.4%	286	17,489	6120.4%	4.50%	0.1132
	Past	1,302,840,897	292,991,072	22.5%	1,910,721,365	360,268,204	18.9%		
	Future	885,904,356	2,446,723,934	276.2%	618,210,756	1,251,334,005	202.4%		
	Lifetime	2,188,745,254	2,739,715,007	125.2%	2,528,932,120	1,611,602,209	63.7%		

¹ Proposed Virginia rate schedule reflects a cumulative 76% premium rate increase from premium rate increases of three 10% increases plus the requested 32.3% premium rate increase.

Attachment 3
RiverSource Life Insurance Company
Virginia Experience
Experience with Premiums Restated to Proposed Virginia Premium Level since Inception¹
Policy Form: 30160A-VA, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio		
	2000	274,304	0	0.0%	567,089	0	0.0%	4.50%	2.0674
	2001	2,178,562	0	0.0%	4,309,953	0	0.0%	4.50%	1.9783
	2002	3,959,711	202,166	5.1%	7,496,348	382,732	5.1%	4.50%	1.8932
	2003	4,939,091	0	0.0%	8,947,814	0	0.0%	4.50%	1.8116
	2004	4,743,059	349,750	7.4%	8,222,656	606,334	7.4%	4.50%	1.7336
	2005	4,649,926	828,057	17.8%	7,714,067	1,373,718	17.8%	4.50%	1.6590
	2006	4,577,605	18,954	0.4%	7,267,070	30,090	0.4%	4.50%	1.5875
	2007	4,546,377	544,718	12.0%	6,906,694	827,517	12.0%	4.50%	1.5192
	2008	4,343,407	585,747	13.5%	6,314,209	851,527	13.5%	4.50%	1.4537
	2009	4,275,708	627,511	14.7%	5,948,127	872,958	14.7%	4.50%	1.3911
	2010	4,208,823	21,879	0.5%	5,602,947	29,126	0.5%	4.50%	1.3312
	2011	4,153,175	526,552	12.7%	5,290,781	670,781	12.7%	4.50%	1.2739
	2012	4,094,606	924,617	22.6%	4,991,550	1,127,159	22.6%	4.50%	1.2191
	2013	3,994,021	870,185	21.8%	4,659,265	1,015,123	21.8%	4.50%	1.1666
	2014	3,905,466	793,903	20.3%	4,359,770	886,254	20.3%	4.50%	1.1163
	2015	3,826,423	1,383,368	36.2%	4,087,591	1,477,788	36.2%	4.50%	1.0683
	2016	3,739,302	1,739,623	46.5%	3,822,510	1,778,333	46.5%	4.50%	1.0223
Projected Future Experience	2017	3,650,145	1,966,991	53.9%	3,570,688	1,924,173	53.9%	4.50%	0.9782
	2018	3,536,940	2,137,533	60.4%	3,310,955	2,000,960	60.4%	4.50%	0.9361
	2019	3,418,112	2,349,062	68.7%	3,061,932	2,104,281	68.7%	4.50%	0.8958
	2020	3,293,879	2,598,971	78.9%	2,823,583	2,227,893	78.9%	4.50%	0.8572
	2021	3,163,939	2,883,960	91.2%	2,595,403	2,365,734	91.2%	4.50%	0.8203
	2022	3,027,794	3,180,493	105.0%	2,376,768	2,496,634	105.0%	4.50%	0.7850
	2023	2,886,053	3,489,179	120.9%	2,167,946	2,621,002	120.9%	4.50%	0.7512
	2024	2,739,745	3,814,138	139.2%	1,969,419	2,741,727	139.2%	4.50%	0.7188
	2025	2,588,873	4,146,504	160.2%	1,780,829	2,852,290	160.2%	4.50%	0.6879
	2026	2,433,851	4,480,971	184.1%	1,602,098	2,949,629	184.1%	4.50%	0.6583
	2027	2,276,126	4,812,178	211.4%	1,433,756	3,031,242	211.4%	4.50%	0.6299
	2028	2,116,418	5,133,332	242.5%	1,275,746	3,094,297	242.5%	4.50%	0.6028
	2029	1,954,870	5,409,872	276.7%	1,127,624	3,120,566	276.7%	4.50%	0.5768
	2030	1,792,894	5,629,507	314.0%	989,657	3,107,423	314.0%	4.50%	0.5520
	2031	1,632,669	5,799,105	355.2%	862,407	3,063,196	355.2%	4.50%	0.5282
	2032	1,475,786	5,913,640	400.7%	745,969	2,989,182	400.7%	4.50%	0.5055
	2033	1,323,898	5,971,811	451.1%	640,377	2,888,599	451.1%	4.50%	0.4837
	2034	1,178,749	5,986,038	507.8%	545,615	2,770,795	507.8%	4.50%	0.4629
	2035	1,041,473	5,947,665	571.1%	461,314	2,634,482	571.1%	4.50%	0.4429
	2036	912,522	5,848,176	640.9%	386,790	2,478,864	640.9%	4.50%	0.4239
	2037	792,545	5,691,988	718.2%	321,470	2,308,766	718.2%	4.50%	0.4056
	2038	682,797	5,486,825	803.6%	265,028	2,129,712	803.6%	4.50%	0.3882
	2039	583,610	5,240,044	897.9%	216,774	1,946,338	897.9%	4.50%	0.3714
	2040	494,768	4,950,187	1000.5%	175,861	1,759,498	1000.5%	4.50%	0.3554
	2041	415,897	4,606,104	1107.5%	141,461	1,566,696	1107.5%	4.50%	0.3401
	2042	346,527	4,217,458	1217.1%	112,790	1,372,731	1217.1%	4.50%	0.3255
	2043	286,105	3,804,756	1329.8%	89,114	1,185,073	1329.8%	4.50%	0.3115
	2044	234,005	3,393,119	1450.0%	69,747	1,011,349	1450.0%	4.50%	0.2981
	2045	189,546	2,989,623	1577.3%	54,063	852,712	1577.3%	4.50%	0.2852
	2046	152,012	2,601,435	1711.3%	41,490	710,039	1711.3%	4.50%	0.2729
	2047	120,670	2,234,741	1851.9%	31,518	583,687	1851.9%	4.50%	0.2612
	2048	94,787	1,895,345	1999.6%	23,691	473,724	1999.6%	4.50%	0.2499
	2049	73,653	1,586,571	2154.1%	17,616	379,472	2154.1%	4.50%	0.2392
	2050	56,595	1,310,125	2314.9%	12,953	299,859	2314.9%	4.50%	0.2289
	2051	42,987	1,066,887	2481.9%	9,415	233,672	2481.9%	4.50%	0.2190
	2052	32,260	856,082	2653.7%	6,761	179,427	2653.7%	4.50%	0.2096
	2053	23,910	676,767	2830.5%	4,796	135,736	2830.5%	4.50%	0.2006
	2054	17,493	527,067	3013.0%	3,357	101,159	3013.0%	4.50%	0.1919
	2055	12,627	404,149	3200.6%	2,319	74,227	3200.6%	4.50%	0.1837
	2056	8,989	304,843	3391.3%	1,580	53,578	3391.3%	4.50%	0.1758
	2057	6,307	226,212	3586.6%	1,061	38,046	3586.6%	4.50%	0.1682
	2058	4,360	164,934	3783.3%	702	26,545	3783.3%	4.50%	0.1609
	2059	2,967	118,087	3980.5%	457	18,187	3980.5%	4.50%	0.1540
	2060	1,986	82,902	4174.4%	293	12,218	4174.4%	4.50%	0.1474
	2061	1,306	57,055	4367.3%	184	8,047	4367.3%	4.50%	0.1410
	2062	843	38,436	4557.7%	114	5,187	4557.7%	4.50%	0.1350
	2063	533	25,264	4738.8%	69	3,263	4738.8%	4.50%	0.1291
	2064	329	16,184	4915.4%	41	2,000	4915.4%	4.50%	0.1236
	2065	198	10,085	5093.4%	23	1,193	5093.4%	4.50%	0.1183
	2066	115	6,093	5275.6%	13	690	5275.6%	4.50%	0.1132
	Past	66,409,565	9,417,030	14.2%	96,508,440	11,929,440	12.4%		
	Future	51,125,465	142,088,491	277.9%	35,333,636	70,935,799	200.8%		
	Lifetime	117,535,031	151,505,521	128.9%	131,842,076	82,865,239	62.9%		

¹ Proposed Virginia rate schedule reflects a cumulative 76% premium rate increase from premium rate increases of three 10% increases plus the requested 32.3% premium rate increase.

Attachment 4
RiverSource Life Insurance Company
Status of Long Term Care Premium Rate Increase Filings as of July 12, 2018
Policy Form 30160A, Subject to Endorsement Form 32100

State	First Nationwide Request			Follow-Up to First Request			Second Nationwide Request			Third Nationwide Request			Fourth Nationwide Request			Fifth Nationwide Request				Cumulative Premium Rate Increase	Annualized Premium as of 12/31/2016
	Date of Disposition	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Submission	Rate Increase	Effective Date	Date of Submission	Date of Disposition	Rate Increase	Effective Date		
Alabama	6/19/2007	10.0%	9/1/2007				8/9/2011	10.0%	1/1/2012	11/20/2012	10.0%	4/1/2013	11/5/2015	15.0%	9/1/2016	1/8/2018	4/6/2018	15.0%	TBD	76.0%	562,801
Alaska ¹	4/4/2007	10.0%	9/1/2007				N/A	10.0%	5/1/2011	N/A	10.0%	4/1/2013	N/A	15.0%	9/1/2015	N/A	N/A	15.0%	10/1/2017	76.0%	27,985
Arizona	6/7/2007	7.5%	9/1/2007				8/25/2011	12.6%	1/1/2012	7/23/2013	10.0%	11/1/2013	8/28/2015	15.0%	12/1/2015	7/13/2017	4/8/2018	15.0%	7/1/2018	76.0%	668,098
Arkansas	3/25/2008	10.0%	6/1/2008													4/6/2018	4/25/2018	25.0%	8/1/2018	37.5%	251,311
Colorado	5/3/2007	10.0%	9/1/2007				7/25/2011	10.0%	10/1/2011	8/8/2013	10.0%	1/1/2014	6/26/2015	15.0%	10/1/2015					53.1%	744,661
Connecticut	12/14/2007	5.0%	3/1/2008							10/17/2017	19.9%	1/1/2018								25.9%	1,318,452
Delaware	7/2/2007	10.0%	10/1/2007				8/4/2011	10.0%	11/1/2011	3/6/2013	10.0%	6/1/2013	10/26/2015	15.0%	2/1/2016	8/17/2017	12/4/2017	15.0%	3/1/2018	76.0%	298,850
District of Columbia																				0.0%	56,361
Florida	10/18/2007	10.0%	1/1/2008				3/16/2017	41.0% ⁸	4/1/2018				10/16/2015	10.0%	1/1/2016					55.1%	2,964,459
Georgia	7/2/2007	6.0%	10/1/2007	7/29/2008	3.8%	11/1/2008	2/16/2011	6.0%	5/1/2011	1/16/2013	9.9%	4/1/2013	10/16/2015	10.0%	1/1/2016	7/12/2017	9/15/2017	12.0%	1/1/2018	57.9%	1,176,637
Hawaii	5/6/2008	10.0%	8/1/2008				11/3/2011	10.0%	2/1/2012	1/13/2014	10.0%	4/1/2014	32.3% Increase - Submitted 8/11/2015							33.1%	799,150
Idaho	9/4/2007	10.0%	12/1/2007				5/12/2011	10.0%	8/1/2011	12/19/2013	10.0%	4/1/2014	2/11/2016	15.0%	5/1/2016					53.1%	161,602
Illinois ²	9/12/2007	10.0%	12/1/2007				3/29/2011	10.0%	7/1/2011	10/25/2013	10.0%	2/1/2014	1/21/2016	15.0%	5/1/2016	15% Increase - Submitted 3/9/2018				53.1%	2,060,716
Indiana	4/11/2010	10.0%	7/1/2010				4/10/2013	10.0%	7/1/2013	12/7/2015	10.0%	3/1/2016								33.1%	494,635
Iowa ²	2/5/2008	10.0%	5/1/2008				4/26/2011	10.0%	8/1/2011	4/3/2013	10.0%	7/1/2013	8/25/2015	15.0%	12/1/2015	6/1/2017	9/13/2017	15.0%	12/1/2017	76.0%	1,171,594
Kentucky	6/14/2007	10.0%	10/1/2007				2/14/2011	10.0%	5/1/2011	4/23/2013	10.0%	8/1/2013	8/17/2015	10.0%	12/1/2015	5/23/2017	8/16/2017	20.2%	12/1/2017	76.0%	567,872
Louisiana	9/7/2007	10.0%	5/1/2008				11/9/2011	10.0%	2/1/2012	11/7/2013	10.0%	2/1/2014	6/28/2016	15.0%	10/1/2016	15% Increase - Submitted 3/14/2018				53.1%	572,465
Maine	3/28/2007	10.0%	9/1/2007				6/20/2011	10.0%	10/1/2011	9/17/2013	10.0%	12/1/2013	8/10/2016	14.8%	4/1/2017					52.8%	656,054
Maryland	9/25/2007	10.0%	1/1/2008				7/15/2011	10.0%	1/1/2012	6/5/2013	10.0%	9/1/2013	11/16/2015	15.0%	2/1/2016					53.1%	2,117,890
Massachusetts	6/1/2012	10.0%	10/1/2012				1/20/2017	10.0%	10/1/2017				5/6/2015	15.0%	9/1/2015	4/12/2017	4/21/2017	15.0%	10/1/2017	21.0%	2,168,254
Michigan	4/9/2007	10.0%	9/1/2007				12/18/2010	10.0%	5/1/2011	12/4/2012	10.0%	4/1/2013	5/6/2015	15.0%	9/1/2015					76.0%	2,907,258
Minnesota ²	8/9/2007	10.0%	11/1/2007				3/9/2011	10.0%	6/1/2011	2/20/2014	10.0%	6/1/2014	2/5/2016	15.0%	5/1/2016					53.1%	2,029,132
Mississippi	7/18/2007	10.0%	10/1/2007				3/1/2011	10.0%	6/1/2011	4/22/2013	10.0%	8/1/2013	5/14/2015	15.0%	9/1/2015	6/28/2017	12/13/2017	15.0%	3/1/2018	76.0%	202,218
Missouri	5/2/2007	10.0%	9/1/2007				2/17/2011	10.0%	5/1/2011	5/7/2013	10.0%	8/1/2013	3/10/2015	15.0%	9/1/2015	4/11/2017	4/13/2017	15.0%	10/1/2017	76.0%	954,228
Montana	8/8/2007	10.0%	11/1/2007				1/14/2011	10.0%	5/1/2011	2/21/2013	10.0%	6/1/2013	7/13/2015	15.0%	11/1/2015	11/14/2017	11/24/2017	13.2%	3/1/2018	73.3%	170,285
Nebraska	6/25/2007	10.0%	10/1/2007				5/11/2011	10.0%	8/1/2011	2/14/2013	10.0%	5/1/2013	2/23/2016	34.9%	9/1/2016					79.6%	683,238
Nevada	10/15/2014	33.1% ⁷	3/1/2015													8/21/2018	11/6/2018	32.3%	3/1/2018	76.0%	420,390
New Hampshire	5/25/2007	10.0%	9/1/2007				6/12/2011	10.0%	9/1/2011	4/19/2013	10.0%	8/1/2013	10/7/2015	15.0% ⁹	1/1/2016					53.1%	761,600
New Jersey ³	6/19/2007	10.0%	9/1/2007				8/9/2011	10.0%	1/1/2012	12/4/2012	10.0%	4/1/2013	11/5/2015	15.0%	9/1/2016	1/8/2018	4/6/2018	15.0%	TBD	76.0%	2,522,601
New Mexico	7/23/2007	10.0%	11/1/2007				1/11/2016	8.0%	9/1/2016				6/26/2013	10.0%	10/1/2013	6/26/2015	6/12/2018	10.0%	9/1/2018	30.7%	129,389
North Carolina ²	8/1/2007	10.0%	11/1/2007				3/10/2011	10.0%	6/1/2011	6/26/2013	10.0%	6/1/2013	6/3/2015	10.0%	9/1/2015	4/26/2017	6/9/2017	15.0%	10/1/2017	76.0%	1,446,975
North Dakota	3/27/2007	10.0%	9/1/2007				2/1/2011	10.0%	5/1/2011	3/11/2013	10.0%	6/1/2013	6/3/2015	10.0%	9/1/2015	8/3/2017	9/14/2017	20.2%	1/1/2018	76.0%	285,238
Ohio	6/21/2007	10.0%	9/1/2007				3/17/2011	10.0%	6/1/2011	4/20/2015	10.0%	7/1/2015	2/12/2017	15.0%	5/1/2017					53.1%	2,442,303
Oklahoma ²	8/21/2008	10.0%	11/1/2008				9/15/2011	10.0%	1/1/2012	9/16/2013	10.0%	12/1/2013	10/7/2015	10.0%	1/1/2016	2/16/2018	3/27/2018	10.0%	7/1/2018	61.1%	244,051
Oregon	4/23/2007	10.0%	9/1/2007				8/15/2011	10.0%	1/1/2012	11/18/2013	10.0%	2/1/2014	11/5/2015	15.0%	9/1/2016					53.1%	1,043,814
Pennsylvania ²	9/17/2007	10.0%	12/1/2007				3/21/2011	10.0%	6/1/2011	5/6/2013	10.0%	8/1/2013	9/16/2015	15.0%	12/1/2015	6/20/2017	8/24/2017	15.0%	12/1/2017	76.0%	3,042,208
Rhode Island	2/28/2008	10.0%	6/1/2008				10/24/2011	10.0%	2/1/2012	10/20/2016	10.0%	9/1/2017								33.1%	215,546
South Carolina	5/21/2007	10.0%	9/1/2007				3/10/2011	10.0%	6/1/2011	3/22/2013	10.0%	7/1/2013	5/7/2015	15.0%	9/1/2015	6/8/2017	9/1/2017	15.0%	12/1/2017	76.0%	723,400
South Dakota ²	9/28/2007	10.0%	1/1/2008				12/23/2010	10.0%	5/1/2011	1/28/2013	10.0%	5/1/2013	9/4/2015	15.0%	12/1/2015	6/20/2017	8/18/2017	15.0%	12/1/2017	76.0%	248,630
Tennessee	4/30/2007	10.0%	9/1/2007				1/14/2011	10.0%	5/1/2011	4/8/2013	10.0%	7/1/2013	8/3/2015	15.0%	11/1/2015	4/19/2017	10/5/2017	15.0%	1/1/2018	76.0%	1,409,082
Texas ⁴	10/29/2007	10.0%	2/1/2008				9/9/2011	10.0%	12/1/2011	2/10/2016	26.5%	5/1/2016				32.3% Increase - Submitted 2/8/2018				53.1%	2,813,254
Texas ⁵	2/10/2016	26.5%	5/1/2016													32.3% Increase - Submitted 2/8/2018				26.5%	829,015
Utah	11/14/2007	10.0%	2/1/2008				3/17/2011	10.0%	6/1/2011	10/7/2013	10.0%	1/1/2014	3/3/2016	15.0%	6/1/2016	1/8/2018	2/9/2018	15.0%	6/1/2018	76.0%	352,907
Vermont	40% Increase - Submitted 11/15/2017																			0.0%	155,436
Virginia	6/21/2007	10.0%	9/1/2007				11/26/2011	10.0%	3/1/2012	12/3/2014	10.0%	6/1/2015				32.3% Increase - Submitted 8/3/2017				33.1%	2,801,223
Washington	8/6/2007	10.0%	11/1/2007	10/20/2008	10.0%	1/1/2009	5/2/2011	10.0%	8/1/2011	10/23/2013	15.0%	2/1/2014	8/10/2016	15.0%	11/1/2016	15% Increase - Submitted 1/26/2018				76.0%	1,511,122
West Virginia	5/3/2007	10.0%	9/1/2007				3/18/2011	10.0%	6/1/2011	8/23/2013	10.0%	11/1/2013	6/2/2015	15.0%	9/1/2015	4/19/2017	5/1/2017	15.0%	10/1/2017	76.0%	282,121
Wisconsin	6/27/2007	10.0%	10/1/2007				3/17/2011	10.0%	6/1/2011	2/6/2013	10.0%	6/1/2013	5/15/2015	15.0% ¹⁰	9/1/2015	5/1/2017	6/27/2017	15.0% ¹⁰	10/1/2017	76.0% ¹⁰	1,127,153
Wyoming	3/13/2007	10.0%	9/1/2007				1/28/2011	10.0%	5/1/2011	6/13/2013	10.0%	9/1/2013	11/6/2015	15.0%	2/1/2016	4/18/2017	4/25/2017	15.0%	2/1/2018	76.0%	65,480
Illinois ⁶	9/12/2007	10.0%	12/1/2007	3/																	

Attachment 5
RiverSource Life Insurance Company
Nationwide Experience
Historical Actual Experience and Projected Future Experience based on Actual Inforce as of 12/31/2016
Experience Restated to Original Virginia Rate Level
Future Experience Projected Using All Original Pricing Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio		
	2000	3,315,277	0	0.0%	6,853,913	0	0.0%	4.50%	2.0674
	2001	26,853,063	521,781	1.9%	53,124,680	1,032,264	1.9%	4.50%	1.9783
	2002	48,216,250	2,022,911	4.2%	91,280,843	3,829,685	4.2%	4.50%	1.8932
	2003	58,072,841	1,472,260	2.5%	105,206,602	2,667,193	2.5%	4.50%	1.8116
	2004	55,093,233	4,387,605	8.0%	95,510,669	7,606,435	8.0%	4.50%	1.7336
	2005	53,271,422	7,130,941	13.4%	88,375,448	11,829,984	13.4%	4.50%	1.6590
	2006	51,921,930	6,277,520	12.1%	82,427,452	9,965,731	12.1%	4.50%	1.5875
	2007	50,894,571	13,543,924	26.6%	77,317,218	20,575,446	26.6%	4.50%	1.5192
	2008	48,433,103	9,334,713	19.3%	70,409,419	13,570,299	19.3%	4.50%	1.4537
	2009	46,947,186	17,977,677	38.3%	65,310,309	25,009,543	38.3%	4.50%	1.3911
	2010	45,824,666	18,309,058	40.0%	61,003,562	24,373,724	40.0%	4.50%	1.3312
	2011	44,715,853	26,637,809	59.6%	56,964,084	33,934,238	59.6%	4.50%	1.2739
	2012	43,649,950	26,435,828	60.6%	53,211,691	32,226,729	60.6%	4.50%	1.2191
	2013	42,431,434	26,823,198	63.2%	49,498,806	31,290,866	63.2%	4.50%	1.1666
	2014	41,280,153	29,614,045	71.7%	46,082,075	33,058,904	71.7%	4.50%	1.1163
	2015	40,145,806	44,176,904	110.0%	42,885,909	47,192,145	110.0%	4.50%	1.0683
	2016	39,044,134	48,048,661	123.1%	39,912,960	49,117,860	123.1%	4.50%	1.0223
Projected Future Experience	2017	37,148,157	40,422,087	108.8%	36,252,889	39,447,918	108.8%	5.00%	0.9759
	2018	34,081,520	42,214,389	123.9%	31,676,341	39,235,262	123.9%	5.00%	0.9294
	2019	31,177,384	43,974,427	141.0%	27,597,289	38,924,850	141.0%	5.00%	0.8852
	2020	28,433,838	45,747,951	160.9%	23,970,271	38,566,400	160.9%	5.00%	0.8430
	2021	25,848,777	47,494,617	183.7%	20,753,347	38,132,260	183.7%	5.00%	0.8029
	2022	23,419,835	49,016,805	209.3%	17,907,818	37,480,369	209.3%	5.00%	0.7646
	2023	21,144,339	50,347,108	238.1%	15,397,977	36,664,358	238.1%	5.00%	0.7282
	2024	19,019,293	51,493,755	270.7%	13,190,906	35,713,698	270.7%	5.00%	0.6936
	2025	17,041,368	52,430,063	307.7%	11,256,294	34,631,503	307.7%	5.00%	0.6605
	2026	15,206,905	53,083,525	349.1%	9,566,267	33,393,459	349.1%	5.00%	0.6291
	2027	13,511,910	53,414,374	395.3%	8,095,228	32,001,512	395.3%	5.00%	0.5991
	2028	11,952,056	53,402,945	446.8%	6,819,706	30,471,109	446.8%	5.00%	0.5706
	2029	10,522,670	53,040,780	504.1%	5,718,205	28,823,297	504.1%	5.00%	0.5434
	2030	9,218,723	52,334,729	567.7%	4,771,064	27,085,349	567.7%	5.00%	0.5175
	2031	8,034,843	51,282,124	638.2%	3,960,341	25,276,746	638.2%	5.00%	0.4929
	2032	6,965,343	49,853,912	715.7%	3,269,704	23,402,654	715.7%	5.00%	0.4694
	2033	6,004,254	48,073,965	800.7%	2,684,328	21,492,479	800.7%	5.00%	0.4471
	2034	5,145,366	46,003,628	894.1%	2,190,804	19,587,515	894.1%	5.00%	0.4258
	2035	4,382,275	43,653,959	996.1%	1,777,042	17,701,970	996.1%	5.00%	0.4055
	2036	3,708,437	41,061,217	1107.2%	1,432,186	15,857,711	1107.2%	5.00%	0.3862
	2037	3,117,236	38,265,622	1227.5%	1,146,540	14,074,343	1227.5%	5.00%	0.3678
	2038	2,602,047	35,329,855	1357.8%	911,476	12,375,761	1357.8%	5.00%	0.3503
	2039	2,156,289	32,316,040	1498.7%	719,362	10,780,997	1498.7%	5.00%	0.3336
	2040	1,773,484	29,260,269	1649.9%	563,480	9,296,721	1649.9%	5.00%	0.3177
	2041	1,447,309	26,220,004	1811.6%	437,949	7,934,050	1811.6%	5.00%	0.3026
	2042	1,171,645	23,251,007	1984.5%	337,652	6,700,615	1984.5%	5.00%	0.2882
	2043	940,638	20,401,979	2169.0%	258,170	5,599,585	2169.0%	5.00%	0.2745
	2044	748,745	17,713,418	2365.7%	195,717	4,630,167	2365.7%	5.00%	0.2614
	2045	590,782	15,213,208	2575.1%	147,073	3,787,266	2575.1%	5.00%	0.2489
	2046	461,949	12,925,343	2798.0%	109,524	3,064,487	2798.0%	5.00%	0.2371
	2047	357,865	10,860,882	3034.9%	80,806	2,452,401	3034.9%	5.00%	0.2258
	2048	274,582	9,023,185	3286.2%	59,049	1,940,425	3286.2%	5.00%	0.2150
	2049	208,598	7,410,041	3552.3%	42,723	1,517,639	3552.3%	5.00%	0.2048
	2050	156,846	6,012,064	3833.1%	30,594	1,172,687	3833.1%	5.00%	0.1951
	2051	116,675	4,816,822	4128.4%	21,674	894,808	4128.4%	5.00%	0.1858
	2052	85,827	3,809,427	4438.5%	15,185	673,968	4438.5%	5.00%	0.1769
	2053	62,403	2,972,000	4762.6%	10,515	500,771	4762.6%	5.00%	0.1685
	2054	44,823	2,286,820	5101.9%	7,193	366,972	5101.9%	5.00%	0.1605
	2055	31,788	1,734,512	5456.4%	4,858	265,088	5456.4%	5.00%	0.1528
	2056	22,246	1,296,212	5826.6%	3,238	188,668	5826.6%	5.00%	0.1456
	2057	15,353	953,955	6213.4%	2,128	132,240	6213.4%	5.00%	0.1386
	2058	10,442	690,975	6617.3%	1,379	91,223	6617.3%	5.00%	0.1320
	2059	6,992	491,935	7035.5%	879	61,853	7035.5%	5.00%	0.1257
	2060	4,605	343,743	7464.8%	551	41,162	7464.8%	5.00%	0.1197
	2061	2,978	235,223	7898.1%	340	26,826	7898.1%	5.00%	0.1140
	2062	1,888	157,281	8330.6%	205	17,083	8330.6%	5.00%	0.1086
	2063	1,170	102,506	8758.8%	121	10,603	8758.8%	5.00%	0.1034
	2064	707	64,937	9182.0%	70	6,397	9182.0%	5.00%	0.0985
	2065	415	39,907	9613.7%	39	3,744	9613.7%	5.00%	0.0938
	2066	236	23,682	10052.5%	21	2,116	10052.5%	5.00%	0.0894
Past Future Lifetime	Past	740,110,871	282,714,836	38.2%	1,085,375,642	347,281,047	32.0%		
	Future	348,383,858	1,272,569,215	365.3%	253,396,518	702,501,088	277.2%		
	Lifetime	1,088,494,730	1,555,284,051	142.9%	1,338,772,159	1,049,782,134	78.4%		

Attachment 6
RiverSource Life Insurance Company
Nationwide Experience
Historical Experience Adjusted for Prior Approved Premium Rate Increases on a Nationwide Basis
Plus Future Experience Adjusted to Assume Original Virginia Premium Rate Level, Projected Using All Original Pricing Assumptions
Policy Form 30160A, Subject to Endorsement Form 32100

	Calendar Year	Loss Ratios Without Interest			Loss Ratios With Interest			Interest Rate	Mid-Year Disc / Accum Factor
		Earned Premiums	Incurred Claims	Incurred Loss Ratio	Earned Premiums	Incurred Claims	Incurred Loss Ratio		
	2000	3,315,277	0	0.0%	6,853,913	0	0.0%	4.50%	2.0674
	2001	26,853,063	521,781	1.9%	53,124,680	1,032,264	1.9%	4.50%	1.9783
	2002	48,216,250	2,022,911	4.2%	91,280,843	3,829,685	4.2%	4.50%	1.8932
	2003	58,072,841	1,472,260	2.5%	105,206,602	2,667,193	2.5%	4.50%	1.8116
	2004	55,093,233	4,387,605	8.0%	95,510,669	7,606,435	8.0%	4.50%	1.7336
	2005	53,271,422	7,130,941	13.4%	88,375,448	11,829,984	13.4%	4.50%	1.6590
	2006	51,921,930	6,277,520	12.1%	82,427,452	9,965,731	12.1%	4.50%	1.5875
	2007	50,894,571	13,543,924	26.6%	77,317,218	20,575,446	26.6%	4.50%	1.5192
	2008	52,273,899	9,376,809	17.9%	75,992,961	13,631,497	17.9%	4.50%	1.4537
	2009	51,630,345	18,077,400	35.0%	71,825,260	25,148,272	35.0%	4.50%	1.3911
	2010	50,395,824	18,410,403	36.5%	67,088,865	24,508,638	36.5%	4.50%	1.3312
	2011	49,176,341	26,784,123	54.5%	62,646,355	34,120,629	54.5%	4.50%	1.2739
	2012	48,853,165	26,601,992	54.5%	59,554,696	32,429,292	54.5%	4.50%	1.2191
	2013	51,004,618	27,101,564	53.1%	59,499,938	31,615,596	53.1%	4.50%	1.1666
	2014	49,927,040	29,916,307	59.9%	55,734,812	33,396,327	59.9%	4.50%	1.1163
	2015	49,415,169	44,644,319	90.3%	52,787,941	47,691,462	90.3%	4.50%	1.0683
	2016	51,614,596	48,420,328	93.8%	52,763,145	49,497,797	93.8%	4.50%	1.0223
Projected Future Experience	2017	37,148,157	40,422,087	108.8%	36,252,889	39,447,918	108.8%	5.00%	0.9759
	2018	34,081,520	42,214,389	123.9%	31,676,341	39,235,262	123.9%	5.00%	0.9294
	2019	31,177,384	43,974,427	141.0%	27,597,289	38,924,850	141.0%	5.00%	0.8852
	2020	28,433,838	45,747,951	160.9%	23,970,271	38,566,400	160.9%	5.00%	0.8430
	2021	25,848,777	47,494,617	183.7%	20,753,347	38,132,260	183.7%	5.00%	0.8029
	2022	23,419,835	49,016,805	209.3%	17,907,818	37,480,369	209.3%	5.00%	0.7646
	2023	21,144,339	50,347,108	238.1%	15,397,977	36,664,358	238.1%	5.00%	0.7282
	2024	19,019,293	51,493,755	270.7%	13,190,906	35,713,698	270.7%	5.00%	0.6936
	2025	17,041,368	52,430,063	307.7%	11,256,294	34,631,503	307.7%	5.00%	0.6605
	2026	15,206,905	53,083,525	349.1%	9,566,267	33,393,459	349.1%	5.00%	0.6291
	2027	13,511,910	53,414,374	395.3%	8,095,228	32,001,512	395.3%	5.00%	0.5991
	2028	11,952,056	53,402,945	446.8%	6,819,706	30,471,109	446.8%	5.00%	0.5706
	2029	10,522,670	53,040,780	504.1%	5,718,205	28,823,297	504.1%	5.00%	0.5434
	2030	9,218,723	52,334,729	567.7%	4,771,064	27,085,349	567.7%	5.00%	0.5175
	2031	8,034,843	51,282,124	638.2%	3,960,341	25,276,746	638.2%	5.00%	0.4929
	2032	6,965,343	49,853,912	715.7%	3,269,704	23,402,654	715.7%	5.00%	0.4694
	2033	6,004,254	48,073,965	800.7%	2,684,328	21,492,479	800.7%	5.00%	0.4471
	2034	5,145,366	46,003,628	894.1%	2,190,804	19,587,515	894.1%	5.00%	0.4258
	2035	4,382,275	43,653,959	996.1%	1,777,042	17,701,970	996.1%	5.00%	0.4055
	2036	3,708,437	41,061,217	1107.2%	1,432,186	15,857,711	1107.2%	5.00%	0.3862
	2037	3,117,236	38,265,622	1227.5%	1,146,540	14,074,343	1227.5%	5.00%	0.3678
	2038	2,602,047	35,329,855	1357.8%	911,476	12,375,761	1357.8%	5.00%	0.3503
	2039	2,156,289	32,316,040	1498.7%	719,362	10,780,997	1498.7%	5.00%	0.3336
	2040	1,773,484	29,260,269	1649.9%	563,480	9,296,721	1649.9%	5.00%	0.3177
	2041	1,447,309	26,220,004	1811.6%	437,949	7,934,050	1811.6%	5.00%	0.3026
	2042	1,171,645	23,251,007	1984.5%	337,652	6,700,615	1984.5%	5.00%	0.2882
	2043	940,638	20,401,979	2169.0%	258,170	5,599,585	2169.0%	5.00%	0.2745
	2044	748,745	17,713,418	2365.7%	195,717	4,630,167	2365.7%	5.00%	0.2614
	2045	590,782	15,213,208	2575.1%	147,073	3,787,266	2575.1%	5.00%	0.2489
	2046	461,949	12,925,343	2798.0%	109,524	3,064,487	2798.0%	5.00%	0.2371
	2047	357,865	10,860,882	3034.9%	80,806	2,452,401	3034.9%	5.00%	0.2258
	2048	274,582	9,023,185	3286.2%	59,049	1,940,425	3286.2%	5.00%	0.2150
	2049	208,598	7,410,041	3552.3%	42,723	1,517,639	3552.3%	5.00%	0.2048
	2050	156,846	6,012,064	3833.1%	30,594	1,172,687	3833.1%	5.00%	0.1951
	2051	116,675	4,816,822	4128.4%	21,674	894,808	4128.4%	5.00%	0.1858
	2052	85,827	3,809,427	4438.5%	15,185	673,968	4438.5%	5.00%	0.1769
	2053	62,403	2,972,000	4762.6%	10,515	500,771	4762.6%	5.00%	0.1685
	2054	44,823	2,286,820	5101.9%	7,193	366,972	5101.9%	5.00%	0.1605
	2055	31,788	1,734,512	5456.4%	4,858	265,088	5456.4%	5.00%	0.1528
	2056	22,246	1,296,212	5826.6%	3,238	188,668	5826.6%	5.00%	0.1456
	2057	15,353	953,955	6213.4%	2,128	132,240	6213.4%	5.00%	0.1386
	2058	10,442	690,975	6617.3%	1,379	91,223	6617.3%	5.00%	0.1320
	2059	6,992	491,935	7035.5%	879	61,853	7035.5%	5.00%	0.1257
	2060	4,605	343,743	7464.8%	551	41,162	7464.8%	5.00%	0.1197
	2061	2,978	235,223	7898.1%	340	26,826	7898.1%	5.00%	0.1140
	2062	1,888	157,281	8330.6%	205	17,083	8330.6%	5.00%	0.1086
	2063	1,170	102,506	8758.8%	121	10,603	8758.8%	5.00%	0.1034
	2064	707	64,937	9182.0%	70	6,397	9182.0%	5.00%	0.0985
	2065	415	39,907	9613.7%	39	3,744	9613.7%	5.00%	0.0938
	2066	236	23,682	10052.5%	21	2,116	10052.5%	5.00%	0.0894
Past Future Lifetime	Past	801,929,585	284,690,187	35.5%	1,157,990,800	349,546,249	30.2%		
	Future	348,383,858	1,272,569,215	365.3%	253,396,518	702,501,088	277.2%		
	Lifetime	1,150,313,443	1,557,259,401	135.4%	1,411,387,318	1,052,047,336	74.5%		

Attachment 7
RiverSource Life Insurance Company
Nationwide Experience

Expected Lifetime Loss Ratio Based on Original Pricing Assumptions¹
Policy Form 30160A, Subject to Endorsement Form 32100

Calendar Year	A Earned Premiums	B Incurred Claims	C = B / A Incurred Loss Ratio
2000	3,274,137	202,807	6.2%
2001	26,444,524	1,558,883	5.9%
2002	46,714,832	3,598,016	7.7%
2003	56,054,650	5,460,015	9.7%
2004	52,013,785	6,792,251	13.1%
2005	48,458,320	7,955,989	16.4%
2006	45,389,429	9,075,261	20.0%
2007	42,586,964	10,203,365	24.0%
2008	39,929,018	11,504,814	28.8%
2009	37,383,311	13,039,020	34.9%
2010	34,943,373	14,543,248	41.6%
2011	32,605,874	15,815,246	48.5%
2012	30,367,976	16,862,636	55.5%
2013	28,227,266	17,844,465	63.2%
2014	26,181,707	18,856,623	72.0%
2015	24,229,579	19,888,645	82.1%
2016	22,369,418	20,935,071	93.6%
2017	20,599,925	21,977,289	106.7%
2018	18,919,901	22,991,266	121.5%
2019	17,328,170	23,977,847	138.4%
2020	15,823,533	24,964,529	157.8%
2021	14,404,724	25,946,281	180.1%
2022	13,070,380	26,818,601	205.2%
2023	11,819,017	27,593,796	233.5%
2024	10,649,024	28,268,979	265.5%
2025	9,558,641	28,832,662	301.6%
2026	8,545,958	29,245,300	342.2%
2027	7,608,896	29,488,136	387.5%
2028	6,745,201	29,552,343	438.1%
2029	5,952,424	29,427,512	494.4%
2030	5,227,920	29,114,264	556.9%
2031	4,568,847	28,614,280	626.3%
2032	3,972,190	27,912,996	702.7%
2033	3,434,774	27,018,072	786.6%
2034	2,953,295	25,954,500	878.8%
2035	2,524,341	24,728,990	979.6%
2036	2,144,423	23,361,839	1089.4%
2037	1,810,008	21,872,127	1208.4%
2038	1,517,551	20,296,405	1337.4%
2039	1,263,525	18,665,122	1477.2%
2040	1,044,452	16,997,725	1627.4%
2041	856,927	15,325,783	1788.5%
2042	697,651	13,678,985	1960.7%
2043	563,457	12,086,016	2145.0%
2044	451,340	10,568,389	2341.6%
2045	358,474	9,143,670	2550.7%
2046	282,236	7,827,827	2773.5%
2047	220,215	6,629,332	3010.4%
2048	170,227	5,553,138	3262.2%
2049	130,319	4,599,705	3529.6%
2050	98,768	3,765,068	3812.0%
2051	74,074	3,044,167	4109.6%
2052	54,947	2,429,855	4422.1%
2053	40,293	1,913,457	4748.8%
2054	29,193	1,486,107	5090.6%
2055	20,885	1,137,648	5447.3%
2056	14,744	857,984	5819.4%
2057	10,264	637,272	6208.7%
2058	7,041	465,907	6616.7%
2059	4,756	334,869	7041.4%
2060	3,159	236,269	7479.7%
2061	2,060	163,257	7923.9%
2062	1,317	110,218	8368.2%
2063	823	72,499	8806.9%
2064	502	46,349	9242.0%
2065	297	28,747	9690.8%
2066	170	17,216	10153.7%
Total without Interest	792,755,420	909,916,949	114.8%
Total Discounted @ 5.0%	463,008,897	278,135,963	60.1%

¹ Expected experience has been developed using original pricing assumptions and the distribution of business actually sold, projected from issue.

Attachment 8
RiverSource Life Insurance Company
Nationwide Experience
Historical Active Life Reserve Balances¹

Valuation Date	Nationwide Policy Form 30160A, Subject to Endorsement Form 32100	Virginia Policy Form 30160A-VA, Subject to Endorsement Form 32100
12/31/2000	5,107,758	162,825
12/31/2001	13,513,716	516,099
12/31/2002	43,861,358	1,964,185
12/31/2003	90,774,905	4,246,339
12/31/2004	148,227,764	7,112,357
12/31/2005	204,510,994	9,925,092
12/31/2006	260,321,726	12,724,222
12/31/2007	326,566,577	17,031,449
12/31/2008	380,625,693	20,077,149
12/31/2009	436,278,462	23,306,587
12/31/2010	493,111,043	26,665,907
12/31/2011	454,808,520	24,673,729
12/31/2012	500,646,597	27,461,427
12/31/2013	544,434,639	30,027,446
12/31/2014	587,634,145	32,756,002
12/31/2015	632,030,100	35,292,148
12/31/2016	670,520,492	37,942,811

¹ Active Life Reserve is defined as "midterminal" and includes an unearned premium reserve.

RIVERSOURCE LIFE INSURANCE COMPANY

March 21, 2012

STATEMENT OF VARIABILITY

RE: 291524-VA LTC Coverage Change Request Form

Brackets have been placed around various items in the forms in order to indicate that they are variable and subject to change by us as explained below.

- **Formatting may change due to future changes in typestyle and/or electronic generation of the forms. However, any adaptation we make will not involve changes to text without any necessary prior approval and will always meet or exceed the requirements of your state.**
- **We reserve the right to correct typographical errors.**

1. Date: Will insert date of letter
2. Policy Number: Will insert client policy number
3. Name and Address: Will insert policy owner name and address
4. Company Address: If company address changes, will insert new address
5. Effective Date1: Will insert the date, which is one month prior to the increase effective date, we ask the policyholder get their change request form submitted by in order to ensure that their request is completed by the increase effective date.
6. Effective Date: Will insert date the rate increase on the policy will go into effect.
7. Premium Mode: Will insert the frequency of the policyholder pays premiums(annually, semi-annually, quarterly, monthly)
8. Alternate Premium Mode: Will insert the new modal premium amount if the policyholder takes the option of reducing their daily benefit amount to a level that will keep their premium at approximately the current level.
9. Nursing Home Daily Benefit Amount: Will insert policyholder's current nursing home daily benefit amount.
10. Alternate Nursing Home Daily Benefit Amount: Will insert the nursing home daily benefit amount the policy holder can reduce their coverage to in order to keep their premium at approximately the same amount.
11. Benefit Increase Option: Will insert the amount the daily benefit amount would increase in one year due to the benefit increase option should the policyholder choose to reduce their current daily benefit amount.
12. Statement only appears if the client has that respective benefit, option or rider
13. Letter Closing: Closing of the letter may be changed due to formatting, style, and contact information.
14. Technology System Coding: Technology system coding may be changed to facilitate electronic distribution and identification of form.

RiverSource Life Insurance Company
Statement of Variability
Form 112459 Endorsement

Brackets have been placed around various items in the forms to indicate they are variable and may change as explained below. Formatting may also change due to future changes in typestyle or the software or system used to produce the form. However, any adaptation we make will not involve changes to text without any necessary prior approval and will always meet or exceed the requirements of your state. We reserve the right to correct typographical errors.

Field	Scope of Variation
Address	Will insert the company home address.
Phone number	Will insert the current toll free number.
Policy Number	Will insert policy number
Insured	Will insert name of insured
Coverage Change	This will reflect the choices each policyholder has made. The text in each category below reflects the respective approved policy language. The range of options is as follows:
<u>Daily Benefit Amount</u>	<p>This will only appear if the Daily Benefit Amount is changed. If it is changed, the range of text that may appear is:</p> <p>Original Nursing Home Daily Benefit changed to \$XX.XX Original Daily Benefit – Nursing Home changed to \$XX.XX Original Daily Benefit – Alternate Long-Term Care Facility changed to \$XX.XX Original Covered Care Daily Maximum changed to \$XX.XX Original Facility Care Daily Maximum Benefit Amount changed to \$XX.XX Original Home and Community Care Daily Maximum Benefit Amount changed to \$XX.XX</p> <p>\$XX.XX will represent the insured policy specific data.</p>
<u>Benefit Period</u>	<p>This will only appear if the Benefit Period is changed. If it is changed, the range of text that may appear is:</p> <p>Nursing Home Benefit Limit changed to XX days Confinement Benefit Limit changed to XX days Home Care Rider Maximum Payment Period changed to XX days Covered Care Maximum Payment Period changed to XX days Lifetime Maximum Benefit Amount changed to \$XXX,XXX (YYYY days x \$ZZZ)</p> <p>\$XX.XX and XX will represent the insured policy specific data. The minimum benefit period is two years.</p>
<u>Elimination Period</u>	<p>This will only appear if the Elimination Period is changed. If it is changed, the range of text that may appear is:</p> <p>Nursing Home Deductible Period changed to XX days Confinement Benefit Deductible (Elimination Period) changed to XX days Covered Care Deductible (Elimination Period) changed to XX days Deductible Period to XX days</p> <p>XX will represent the insured policy specific data.</p>
<u>Benefit Increase Option</u>	<p>This will only appear if the Benefit Increase Option is changed. If it is changed, the range of text that may appear is:</p> <p>Benefit Increase Option – Thru Age 85 Do you have this Option? Changed to XXX XXX will display either "Yes, Simple Increase" or "No"</p> <p>Benefit Increase Option Do you have this Option? Changed to XXX XXX will display either "Yes, Simple Increase" or "No"</p> <p>Home Care Benefit Rider Increase Option – Thru Age 85 Do you have this Option? Changed to XXX</p>

	<p>XXX will display either "Yes, Simple Increase" or "No"</p> <p>Home and Community Care Rider Benefit Increase Option Do you have this Option? Changed to XXX XXX will display either "Yes, Simple Increase" or "No"</p> <p>Benefit Increase Option Do you have this Option? Changed to XXX XXX will display either "No" or "Yes"</p> <p>If Yes, these paragraphs will display: "SIMPLE 5% BENEFIT INCREASE: Your applicable Facility Care and Home and Community Care Daily Maximum Benefit Amounts will increase on each anniversary of the Policy Date. Increase will apply to expenses You incur on or after the date of the increase. The first increase, and each increase thereafter, will be equal to 5% of Your original Facility Care and Home and Community Care Daily Maximum Benefit Amounts.</p> <p>Your lifetime Maximum Benefit Amount will also increase on each anniversary of the Policy Date. It will be increased by an amount equal to (a) times (b), where: (a) is the remaining amount of the Maximum Lifetime Benefit Amount before the increase; and (b) is the percent of increase in the Facility Care Daily Maximum Benefit Amount from the previous year to the current year."</p>
<u>Optional Home Care Rider</u>	This will appear if the Optional Home Care Rider is eliminated: "Optional Home Care Rider is eliminated."
<u>Optional Nonforfeiture Benefit Rider</u>	This will appear if the Optional Nonforfeiture Benefit Rider is eliminated: "Optional Nonforfeiture Benefit Rider is eliminated."
<u>Exercised Nonforfeiture Option</u>	<p>This will appear if the Nonforfeiture Benefit Rider is exercised: "Because you purchased a nonforfeiture benefit rider with the above-referenced policy and you have chosen to stop paying premiums, you are entitled to reduced paid-up coverage. This coverage is effective <EFFECTDATE>. Your premium due going forward will be \$0.00.</p> <p>Your Reduced Lifetime Benefit is \$<RLBL>, which represents the sum of all premiums you have paid for this policy, subject to a minimum of 30 times your policy's current nursing home daily benefit amount if you paid premiums for at least three full years. Once total benefits paid on your policy after <EFFECTDATE> reach this reduced maximum lifetime benefit limit, no additional benefits are payable. In addition, the sum of all benefits paid before and after <EFFECTDATE> will not exceed the maximum benefits which would have been payable if your policy had remained in premium paying status. Your Benefit Increase Option, if applicable, will continue to apply to the Daily Benefit Amount but will not apply to the Reduced Lifetime Benefit. All other features of your policy and any riders, including daily benefit limits and deductible (elimination) periods, continue to apply."</p>
<u>Exercised Contingent Benefit Upon Lapse</u>	<p>This will appear if the Contingent Benefit Upon Lapse is exercised: "Because you have chosen to stop paying premiums on the above-referenced policy within 120 days after the effective date of a substantial premium rate increase, you are entitled to reduced paid-up coverage. This coverage is effective <EFFECTDATE>. Your premium due going forward will be \$0.00.</p> <p>Your Reduced Lifetime Benefit is \$<RLBL>, which represents the sum of all premiums you have paid for this policy, subject to a minimum of 30 times your policy's current nursing home daily benefit amount. Once total benefits paid on your policy after <EFFECTDATE> reach this reduced maximum lifetime benefit limit, no additional benefits are payable. In addition, the sum of all benefits paid before and after <EFFECTDATE> will not exceed the maximum benefits which would have been payable if your policy had remained in premium paying status. Your Benefit Increase Option, if applicable, will continue to apply to the Daily Benefit Amount but will not apply to the Reduced Lifetime Benefit. All other features of your policy and any riders, including daily benefit limits and deductible (elimination) periods,</p>

	continue to apply."
Administrative information	The version letter/print date will be changed if any future changes are made to bracketed items for Company address, phone number, or Secretary. The date range will also use 1-12 for the months and the last two numbers of a year.
Effective Date	Will insert effective date of the change
Signature	Will insert the signature and title of current company Corporate Secretary.

RiverSource Life Insurance Company
Statement of Variability
Forms 112016 and 112018

Brackets have been placed around various items in the forms to indicate they are variable and may change as explained below. Formatting may also change due to future changes in typestyle or the software or system used to produce the form. However, any adaptation we make will not involve changes to text without any necessary prior approval and will always meet or exceed the requirements of your state. We reserve the right to correct typographical errors.

Form 112016

Field	Scope of Variation
Address	Will insert the company home address.
Logo	If company logo changes, will insert new logo.
Date	Will insert date of letter.
Policy Number	Will insert policy number.
Name and Address	Will insert policyholder's name and address.
Effective Date	Will insert date the rate increase on the policy will go in to effect.
Virginia State Corporation Commission	If the Virginia State Corporation Commission name changes, will insert updated name.
Web Address	If Bureau of Virginia's website address changes, will insert new web address.
Request for regulatory approval for additional premium increases	This may be modified to reflect the number of years before another premium increase would be effective in accordance with the Virginia State Corporation Commission requirements.
Rate Increase History	Will insert the rate increase history for applicable policy form.
Premium Mode	Will insert the frequency policyholder pays premiums (annual, semi-annual, quarterly, monthly).
Current Premium	Will insert policyholder's current modal premium amount.
New Premium	Will insert policyholder's modal premium amount after the rate increase.
Daily Benefit Amount Reduction	Will insert policyholder's current nursing home daily benefit amount.
Alternate Daily Benefit Amount	Will insert the nursing home daily benefit amount that policyholder can reduce their cover to in order to keep the premium after the rate increase approximately the same as the current premium.
Alternate Premium Amount	Will insert the new modal premium after the rate increase if policyholder chooses to reduce the daily benefit to a level that will keep the premium after the rate increase approximately the same as the current premium. Statement only appears if the client has that respective benefit, option or rider.
Benefit Adjustments-Home Care coverage	If the client has Home Care coverage benefits, this language will appear in the letter.
Benefit Adjustments-Nonforfeiture Benefit Rider	If the client has the Nonforfeiture Benefit Rider, this language will appear in the letter.
Benefit Adjustments-Contingent Benefit Upon Lapse	If the client is eligible for contingent benefit upon lapse, this language will appear in the letter.
Advisor contact information	Advisor name and telephone number will only appear if the client has an advisor.
Client service representative - toll free telephone number	If this telephone number were to change we would update this as needed.
Letter Closing	Letter Closing: Closing of the letter may be changed due to formatting, style, and contact information.
Administrative Information	The version letter/print date will be changed if any future changes are made to bracketed items for the Company address, phone number, Secretary, logo and technology coding. The range will be A-Z. The date range will also use 1-12 for the month and the last two numbers of a year.
Technology Coding	Technology System Coding: Technology system coding may be changed to facilitate electronic distribution and identification of form.

Form 112018

Field	Scope of Variation
Address	Will insert the company home address.
Logo	If company logo changes, will insert new logo.
Date	Will insert date of letter.
Policy Number	Will insert policy number.
Name and Address	Will insert policyholder's name and address.
Effective Date	Will insert date the rate increase on the policy will go in to effect.
Virginia State Corporation Commission	If the Virginia State Corporation Commission name changes, will insert updated name.
Web Address	If Bureau of Virginia's website address changes, will insert new web address.
Request for regulatory approval for additional premium increases	This may be modified to reflect the number of years before another premium increase would be effective in accordance with the Virginia State Corporation Commission requirements.
Rate Increase History	Will insert the rate increase history for applicable policy form.
Premium Mode	Will insert the frequency policyholder pays premiums (annual, semi-annual, quarterly, monthly).
Current Premium	Will insert policyholder's current modal premium amount.
New Premium	Will insert policyholder's modal premium amount after the rate increase.
Daily Benefit Amount Reduction	Will insert policyholder's current nursing home daily benefit amount.
Alternate Daily Benefit Amount	Will insert the nursing home daily benefit amount that policyholder can reduce their cover to in order to keep the premium after the rate increase approximately the same as the current premium.
Alternate Premium Amount	Will insert the new modal premium after the rate increase if policyholder chooses to reduce the daily benefit to a level that will keep the premium after the rate increase approximately the same as the current premium. Statement only appears if the client has that respective benefit, option or rider.
Benefit Adjustments-Home Care coverage	If the client has Home Care coverage benefits, this language will appear in the letter.
Benefit Adjustments-Nonforfeiture Benefit Rider	If the client has the Nonforfeiture Benefit Rider, this language will appear in the letter.
Benefit Adjustments-Contingent Benefit Upon Lapse	If the client is eligible for contingent benefit upon lapse, this language will appear in the letter.
If you decide to modify your coverage -New Premium Effective Date	Will insert the date, which is one month prior to the increase effective date, that we ask the policyholder to get the change request form submitted by in order to ensure the request completed by the increase effective date.
Advisor contact information	Advisor name and telephone number will only appear if the client has an advisor.
Client service representative- toll-free telephone number	If this telephone number were to change we would update this as needed.
Letter Closing	Letter Closing: Closing of the letter may be changed due to formatting, style, and contact information.
Administrative Information	T The version letter/print date will be changed if any future changes are made to bracketed items for the Company address, phone number, Secretary, logo and technology coding. The range will be A-Z. The date range will also use 1-12 for the month and the last two numbers of a year.
Technology Coding	Technology System Coding: Technology system coding may be changed to facilitate electronic distribution and identification of form.

December 12, 2018

Mr. Bill Dismore
Virginia Bureau of Insurance

Via SERFF

RE: RiverSource Life Insurance Company ("RiverSource Life")
Company NAIC # 65005
Company FEIN # 41-0823832
SERFF Tracking # AERS-131005512
Policy Form: Long Term Care Policy Form 30160A-VA
Long Term Care Insurance Endorsement Form 32100

Dear Mr. Dismore:

Thank you for reviewing our filing.

Per the company's request via SERFF Note sent on November 13, 2018, we are revising this filing at this time to request a 40% premium rate increase on the premium associated with the nursing home policy only for policies issued in Virginia.

A revised Actuarial Memorandum that reflects updated experience through June 30, 2018 and current best-estimate assumptions with the revised premium rate increase request has been provided with this response.

In addition to the revised Actuarial Memorandum, this letter provides the additional information requested in your October 23, 2018 objection letter as well as updates to my July 12, 2018 letter providing responses to the August 11, 2017 objection letter from Janet Houser. The additional information provided in this letter for both the August 11, 2017 and October 23, 2018 objection letters are based on the experience updated through June 30, 2018 underlying the revised Actuarial Memorandum. I have restated the requests from both objection letters in italics for reference. Note that any reference to the Actuarial Memorandum in the responses below are to the revised Actuarial Memorandum provided with this response, as described above.

Microsoft Excel workbooks with the information provided in Exhibits 9 and 10 of the Actuarial Memorandum and Attachments 1, 2, 4 through 6 and 8 through 13 to this letter as described in the following has been provided with this response. Note that the earned premiums and claims in these exhibits and attachments are projected using an external projection model and are therefore hard-coded numbers.

As demonstrated in the Actuarial Memorandum, much larger premium rate increases are currently actuarially justifiable. However, the company believes it is appropriate to limit the current premium

rate increase request to 40% in order to minimize the impact on policyholders to the extent we can, with the understanding that the company anticipates seeking additional premium rate increases in the future, even if experience does not deteriorate from current best estimates.

If it is the Bureau's position to only allow future additional premium rate increases if experience deteriorates from current best estimates, we request that the Bureau inform the company prior to approving the requested premium rate increase, as the company would like to amend this filing to request a significantly larger premium rate increase at this time.

Objection Letter Dated August 17, 2017:

Objection 1

According to the revised Actuarial Memorandum, this filing applies to form 30160A -VA with the endorsement 32100. Since rates would be tied to the policy and not specific to the endorsement, please revise the Affected Form Numbers in line one of the Rate/Rule Schedule to reflect 30160A-VA, 32100 and remove line item 2.

The premium rates in this filing are applicable to policy form 30160A-VA **only** when it issued with endorsement form 32100, and there is a different set of premium rates for policy form 30160A-VA with it issued without endorsement (premium rates were approved April 6, 2017, SERFF Tracking Number AERS-129718202). Therefore, we feel it is appropriate to include both the policy form and endorsement form on the Rate/Rule Schedule of SERFF.

The premium rider form 30165A indicates a previous rate increase was approved under SERFF filing AERS-127792983. That filing also included form 30160A-VA without the endorsement. In regards to the policy with endorsement, the company provided the following explanation: "For applications received May 19, 2000 and later, policies were issued with a different set of rates and endorsement 32100, which changed the benefit trigger from 2 of 5 activities of daily living to 2 of 6 (bathing added as the sixth), provided for waiver of premium while receiving home care and allowed for a 20% spousal premium discount". And as noted in this filing, this increase only applies to 30160A-VA with the endorsement 32100.

There is some confusion, however, regarding the rates approved under the prior filing for 30165A. The rate attachments approved for both the rider and the policy reflect the same rates. Please clarify the following:

- 1) *Are the rider rates a percentage factor of the base rates or separate dollar rates?*

Form 30165A is a Nonforfeiture Benefit Rider and is the only rider associated with policy form 30160A-VA, issued both with and without endorsement form 32100. The premium for this rider will be equal to a percentage of the premium of the underlying policy with any rate increase, where the percentage rate is the same as at the time the policy was originally issued.

- 2) *If dollar rates, did the premium actually increase 13% or were the rates actually factors applied to the base rate? Did the factors change at that time or stay the same?*

As described in item #1 above, the premium for the rider factors is equal to a percentage of the premium of the underlying policy. The percentage factors for form 30165A have not changed since the rider was originally approved.

- 3) *When the rates for 30165A were approved under the prior filing, it appears this increase would have only been applicable to those 30160A-VA policies without the endorsement. Is that correct or was the rate increase to the rider applicable regardless if the policy did or did not have the endorsement attached?*

As described in item #2, the percentage factors for form 30165A have not changed since the rider was originally approved, therefore there was no explicit rate increase for rider form 30165A.

- 4) *The company has currently attached factors for 30165A in this filing. What were the factors before this rate increase? And how does this differ from the factors or rates for those policies without the endorsement? If the factors or rates are different depending upon if the endorsement is attached or not, please provide both sets of rates.*

As described in item #2, the percentage factors for form 30165A have not changed since the rider was originally approved, therefore there was no explicit rate increase for rider form 30165A.

Objection 2

- 1) *Please update the Company Rate Information on the Rate/Rule Schedule to reflect the Overall Percentage Rate Impact and update the Percent Rate Change Request under the Rate Action Information to reflect the same percentage which is the percentage increase being requested at this time and not the previously approved increase.*

The "Percent Rate Change Request" field on the Rate/Rule Schedule of SERFF has been updated to reflect the currently requested 40% premium rate increase. The "Overall Percentage Rate Impact" field has been updated to reflect a 39.9% premium rate increase, as described in item #2.

- 2) *According to the Cover Letter, the proposed increase is 32.3% on the base policy and all associated riders for form 30160A-VA with the 32100 endorsement. There is a range of 0% - 32.3% noted on the Rate/Rule Schedule. this is confirmed by Exhibit XIV which demonstrates a range of 0% - 32.3% with a premium cap of \$998.98 resulting no increases for some individuals. Since there is a range, the expectation is that the Overall Percentage rate impact and the proposed rate increase should fall between 0% - 32.3%. Please amend the filing accordingly.*

Of the 1,501 Virginia policyholders in force as of June 30, 2018, there is only one policyholder who has a proposed premium rate with an increase less than the requested 40%. Therefore, the "Overall Percentage Rate Impact" for this filing is 39.9%. The Rate/Rule Schedule of SERFF has been updated to reflect this.

- 3) *There are two options included in the rate sheets: simple benefit increase option and compound benefit increase option. Are the premiums for these benefits a dollar amount or a percentage of*

the base policy? If these are form numbers separate from the base policy, please add the form numbers to the Rate/Rule Schedule and attach a factor or premium rate table for each. If not, please amend the rate attachment to indicate what those factors are on the premium attachment for the base policy.

At the time of original pricing, the premium rates for policies with the Simple Benefit Increase Option ("Simple BIO") and the Compound Benefit Increase Option ("Compound BIO") were determined separately from those for policies with No Benefit Increase Option ("No BIO"). The cumulative premium rate increase previously approved in Virginia for the policy form 30160A-VA issued with endorsement form 32100 has been applied uniformly to all premium rates regardless of the BIO (subject to a maximum premium rate cap of \$999.98). All premium rates shown in Exhibits XIV and XV of the revised Actuarial Memorandum are per \$10 of Original Daily Benefit Amount. There is no separate form number for policies with a Simple or Compound BIO, i.e. there is no "base policy" as referenced in the Bureau's objection.

- 4) *Are there any other riders that would be affected by this rate increase? If so, please add the form number exactly as approved with a corresponding rate schedule.*

Optional nonforfeiture benefit rider form 30165A was the only rider offered with this policy form issued with endorsement at the time of issue.

- 5) *Please update the Rate Request Summary for consistency with the affected form numbers and rate information on page 1.*

The Rate Request Summary has been updated to reflect the "Average Requested Percentage Rate Change Per Member" and "Average Annual Premium Member" to be consistent with the change to be consistent with the change to the "Overall Percentage Rate Impact" in SERFF, as described in item #2 above.

Objection 3

Please provide the following:

- 1) *Re-state the nationwide experience using Virginia approved rates.*

Attachment 1 to this response provides the nationwide actual historical and projected future earned premiums and incurred claims based on actual policies in force as of June 30, 2018 where actual and projected premiums have been restated to reflect the cumulative 33.1% premium rate increase as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis. Note that the loss ratios in before and after the requested premium rate increase in Attachment 1 correspond to the incurred loss ratios shown in Exhibit IX of the revised Actuarial Memorandum provided with this response.

- 2) *Provide a separate calculation of the Lifetime Loss Ratio so that the historical premium component is restated to what it would be if the proposed premium had been charged (collected) since the forms introduction.*

Attachment 2 to this response provides the nationwide experience assuming the proposed Virginia premium rate level (i.e. with cumulative 86.3% rate increase) from inception.

- 3) *Please provide sufficient detail or documentation provided so that any projections can be recreated. Please provide a copy of all projections in Excel with working formulas.*

As described above, a Microsoft Excel workbook with Exhibits 9 and 10 of the Actuarial Memorandum and a Microsoft Excel workbook with Attachments 1, 2, 4 through 6 and 8 through 13 to this letter have been provided with this response. Note that the projected policies in force, earned premiums, paid claims and incurred claims in these exhibits and attachments are a summary of the seriatim-level results projected on a seriatim basis using an external projection model and are therefore hard-coded numbers in the Microsoft Excel workbooks. The formulas used for determining the loss ratios before and after interest are intact in this file.

The following provides a description of the projected experience provided in Exhibits 9 and 10 and Attachments 1, 2, 8 and 9. The projected experience provided in Attachments 4, 5 and 13 is described in item #5 below, and a description of the experience provided in Attachment 6 and 12 is provided in item #6 below.

Starting with actual business in force as of June 30, 2018, we project each policy on a seriatim basis in Exhibits 9 and 10 and Attachments 1 and 2, using the current premium rate increase assumptions as described in section 5 of the Actuarial Memorandum.

The actual and projected earned premiums in Exhibit 10 and Attachment 1 reflect the cumulative 33.1% premium rate increase as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis. The actual and projected earned premiums in Attachment 2 have been adjusted to reflect the cumulative 86.3% proposed premium rate increase from inception, as described in item #2 of Objection 3 above.

The projected paid and incurred claims in Exhibits 10 and 11 and Attachments 1, 2, 8 and 9 are based on the actual benefit provisions in force at the time of projection. Claims and deaths are assumed to occur on a monthly basis, while lapses are assumed to occur on policy anniversaries.

- 4) *Advise in what states the company has requested rate increases on this block, how the rate changes requested in Virginia compare with those requested in other states, and the current status of the reviews in other states.*

Attachment 4 to this response provides a list of the forty-eight jurisdictions (including the District of Columbia) where policy form series 30160A issued with endorsement was offered with the status of all currently requested premium rate increases as of December 12, 2018 and the history of all previous rate revisions which first began in 2007.

- 5) *Please provide a loss ratio projection reflecting the actual historical experience during the historical experience period and then, utilizing the actual in force as of the projection date, projecting forward the expected earned premiums and incurred claims using the original pricing*

assumptions for interest, mortality, morbidity and persistency into the future and assuming the future premiums are paid based on the original premium scale as if no increases had ever been implemented.

Attachments 4 and 5 to this response provide two different versions of loss ratio projections for nationwide experience in accordance with this response, where the historical experience from January 1, 2000 through June 30, 2018 differs as follows:

- historical earned premiums in Attachment 4 have been restated to the original Virginia premium level (i.e. before any rate increases); and
- historical earned premiums in Attachment 5 have been restated to reflect the cumulative 33.1% premium rate increase as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis (i.e. the same as Exhibit 9 of the Actuarial Memorandum and Attachment 1 of this response).

The projected earned premiums in both attachments are based on policies inforce as of June 30, 2018, restated to the original Virginia premium level (i.e. before any premium rate increases), and future experience for earned premiums and incurred claims are projected using all original pricing assumptions for morbidity, mortality and lapse. The average maximum valuation rate of 4.5% is used to accumulate historical experience to the valuation date, and the original pricing interest rate of 5.0% is used to discount projected future experience in both attachments.

- 6) *Please provide a loss ratio projection (both past and future) which reflects all of the original pricing assumptions for interest, mortality, morbidity, persistency and premium scale, but uses the actual distribution of policies as issued rather than the originally assumed mix of business.*

Attachment 6 to this response provides the developed of the nationwide expected lifetime loss ratio for policy form series 30160A issued with endorsement, where expected experience has been developed using the distribution of business actually sold projected from issue using all original pricing assumptions.

- 7) *Please provide the reserve basis and justification for the reserve levels provided.*

Attachment 8 to this response provides the active life reserve (“ALR”) balances for nationwide and Virginia experience as of December 31st for calendar years 2000 through 2017 and June 30, 2018.

The valuation bases used to develop the ALR for this block of business vary by issue year. The reserve methods and assumptions used to calculate the ALR prior to September 30, 2011 are shown in the following Table 1:

Table 1
Active Life Statutory Reserve Assumptions
For Reserve Calculations Prior to September 30, 2011

Issue Year	Interest Rate	Reserve Method	Mortality Table	Lapse Rate	Morbidity Basis	Morbidity Load
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2000 - 2003	4.5%	1-Year FPT	GAP 83a	2.0%	Original Pricing	1.05
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Beginning September 30, 2011 and with the permission of the Minnesota Department of Commerce, we revised the statutory valuation bases to:

- move interest rates and mortality rates to the minimum statutory requirements
- create consistency in lapse assumptions and valuation methods; and
- update morbidity assumptions to reflect recent company experience.

The reserve method and assumptions used to calculate the ALR on or after September 30, 2011 are shown in the following Table 2:

Table 2
Active Life Statutory Reserve Assumptions
For Reserve Calculations On or After September 30, 2011

Issue Year	Interest Rate	Reserve Method	Mortality Table	Lapse Rate	Morbidity Basis	Morbidity Load
2000 – 2003	4.5%	1-Year FPT	GAM 83a	2010 Best Estimate Capped at 4% ¹	2010 Best Estimate	1.00

¹ Lapse assumption is 80% of 2010 best estimate for durations 1-4, capped at 4% for durations 5+

The company performs asset adequacy analysis in aggregate for our inforce long-term care block of business every year, and, if indicated, holds additional asset adequacy analysis reserves. Note that the additional asset adequacy analysis reserve balances are not included in Attachment.

- 8) *If this increase is approved and experience develops as anticipated, will the company forgo increases in the future? If not, what would trigger a rate increase in the future? In other words, what targeted loss ratio does the company plans to manage this block in the future?*

As demonstrated in the Actuarial Memorandum, much larger premium rate increases are currently actuarially justifiable. However, the company believes it is appropriate to limit the current premium rate increase request to 40% in order to minimize the impact on policyholders to the extent we can, with the understanding that the company anticipates seeking additional premium rate increases in the future, even if experience does not deteriorate from current best estimates.

Table 3 shows the isolated impact on the projected lifetime loss ratio of future deviations in each key driver from original assumptions and the corresponding premium rate increase needed to produce the target lifetime loss ratio of 72.3%, which represents the lifetime loss ratio using historical experience combined with projected future experience based on our original pricing assumptions.

Note that Table 3 has been developed using nationwide historical experience through June 30, 2018, where actual and projected premiums reflect the accumulated rate increases as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis, and the loss ratio with all current assumptions corresponds to Exhibit 9 before the requested premium rate increase. Note that the information shown in Table 3 below is also provided in Table 1 in section 16 of the Actuarial Memorandum.

Table 3
RiverSource Life Insurance Company
Impact on Lifetime Loss Ratio of Changing from Original Pricing to Current Assumptions
Nationwide Experience Before Any Premium Rate Increase
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis
Policy Form 30160A, Subject to Endorsement Form 32100

Assumptions	Lifetime Loss Ratio	Impact on Lifetime Loss Ratio	Premium Rate Increase Needed to Produce a Lifetime Loss Ratio of 72.3%
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions	72.3%	N/A	N/A
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	78.5%	6.2%	47.2%
Mortality	74.6%	2.3%	17.4%
Lapse	91.1%	18.8%	118.0%
Interest	76.2%	3.9%	28.3%
Historical Experience through 6/30/2018 & Projections with All Current Assumptions	109.8%	37.5%	213.4%

Note that the lifetime loss ratio for each changed assumption in Table 3 does not reflect any synergy of the assumptions. As a result, the total impact of all current assumptions on the lifetime loss ratio (i.e. 37.5%) is greater than the sum of the impact of each changed assumption (i.e. 31.2% = 6.2% + 2.3% + 18.8% + 3.9%).

As the results in Table 3 show, a premium rate increase that far exceeds the requested increase is currently actuarially justified. RiverSource Life is requesting a premium rate increase at this time that is lower than the current actuarially justified increase, as we believe that it is appropriate to limit the current premium rate increase request to 40% in order to minimize the impact on policyholders to the extent that we can, with the understanding that the company anticipates seeking additional premium rate increases in the future, even if experience does not deteriorate from current best estimates.

If it is the Bureau's position to only allow future additional premium rate increases if experience deteriorates from current best estimates, we request that the Bureau inform the company prior to approving the requested premium rate increase, as the company would like to amend this filing to request a significantly larger premium rate increase at this time.

- 9) *Please note for pre-stability policies, as set forth in 14VAC5-200-150 B, notwithstanding the provision of 14VAC5-130-50 with regard to interest, demonstrations of loss ratios shall be made in compliance with the Rules Governing the Filing of Rates for all Individual and Certain Group Accident and Sickness Insurance Policy Forms (14VAC5-130). All present and accumulated values used to determine rate increases, including the lifetime loss ratio used in the original pricing, shall use the maximum interest rate for contract reserves as specified in Section 38.2-1371 of the Code of Virginia. Please provide updated exhibits if appropriate.*

As described above, the exhibits in the Actuarial Memorandum and Table 1 shown in section 16 of the Actuarial Memorandum have been updated to use an interest rate of 4.50%, which is the average maximum statutory valuation interest rate used for contract reserves determined by weighting the active life reserve balance as of June 30, 2018 by issue year, to accumulate historical experience and discount projected future experience in the determination of the loss ratios. The loss ratios shown in the attachments to this response and in Table 3 above use the 4.50% interest rate to accumulate historical experience and discount projected future experience, and the loss ratios shown in Attachments 4 and 5 use the 4.50% interest rate to accumulate historical experience only.

Objection Letter Dated October 23, 2018:

1. *Please provide the overall A/E ratio for lapses under current assumptions for this block of business.*

The ratio of actual to expected lapses for all business combined (not including policy terminations due to expiration of benefits) is 1.0009, where the expected basis reflects the currently assumed lapse rates as shown in Exhibit 1 of the Actuarial Memorandum.

2. *For all projections requested in the next question, the baseline should comply with the following:*
- a. *Any limited-pay paid-up policies should be removed, both from historical experience and future projections.*

There are no limited-pay policies in this block of business.

- b. *For this pre-stability block, assumptions should be best-estimate, without margins for moderately adverse conditions.*

The assumptions used in this rate filing are based on actual inforce experience of RiverSource Life and are deemed reasonable for these particular policy forms. These are best-estimate assumptions and do not include any provision for profit or contingencies.

- c. *Premiums should be at the Virginia rate level for both historical and projected future.*

The actual and projected premiums for nationwide experience in the exhibits of the Actuarial Memorandum and attachments to this letter reflect the accumulated premium rate increases as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis.

- d. *Please use the appropriate average maximum valuation interest rate for each product series for accumulation and discounting of this block as specified in 14VAC5-200-150.*

The accumulation of historical experience and discounting of projected future experience occur at 4.50%, which is the average maximum statutory valuation interest rate used for contract reserves determined by weighting the active life reserve balance as of June 30, 2018 by issue year, and assume mid-year values, for all exhibits of the Actuarial Memorandum and Attachments 1 and 2, 8 through 11 and 13 to this letter.

- e. *Please ensure that the discount/accumulation formulas are working formulas and specify the interest rates used in each exhibit.*

The formulas used to calculate the accumulation and discounting factors are provided in the Microsoft Excel workbooks provided with this response.

3. *Because the Bureau has observed over the years that there is often internal subsidization occurring between policyholders with different policy characteristics, for each of the four subsets of the business corresponding to the combinations of (limited/lifetime benefit periods) and (without/with inflation protection), please provide (in Excel format) the following projections on a nationwide basis:*

Note the experience in Attachments 8 through 13 as described below is provided separately for policies with a lifetime benefit period with inflation, policies with a lifetime benefit period with no inflation, policies with non-lifetime benefit periods with inflation and policies with non-lifetime benefit periods with no inflation.

- a. *current assumptions and current rates*

Attachment 8 to this response provides the nationwide actual historical and projected future earned premiums and incurred claims before the requested premium rate increases, based on actual policies in force as of June 30, 2018 where actual and projected premiums have been restated to reflect the accumulated 33.1% premium rate increase as approved in Virginia and implemented from 2006 through 2016 on a nationwide basis.

- b. *current assumptions and current rates, including paid-up policies (if any)*

There are no paid-up policies included in Attachment 8.

- c. *current assumptions with the proposed rate increase*

Attachment 9 provides the nationwide actual historical and projected future earned premiums and incurred claims with the requested premium rate increases, based on actual policies in force as of June 30, 2018 where actual and projected premiums have been restated to reflect the accumulated 33.1% premium rate increase as approved in Virginia and implemented from 2006 through 2016 on a nationwide basis. Attachment 9 includes additional lapses, reductions in benefit and adverse selection due to the premium rate increase, as described in section 5 of the Actuarial Memorandum.

- d. *current assumptions with the proposed rate increase, but with no shock lapses, benefit reductions, CBUL, or adverse selection (if applicable)*

Attachment 10 provides similar information as Attachment 9, however there are no additional lapses, reductions in benefit and adverse selection due to the premium rate increase included in Attachment 10.

- e. *current assumptions with premiums restated as if the proposed rate schedule had been in effect from inception*

Attachment 11 provides the nationwide actual historical and projected future earned premiums and incurred claims, based on actual policies in force as of June 30, 2018 where actual and projected premiums have been restated assuming the proposed Virginia premium rate level (i.e. with cumulative 188.4% rate increase for policies with a lifetime benefit period and a cumulative 166.1% rate increase for policies with non-lifetime benefit periods) from inception.

- f. *original assumptions and original premiums from inception with the actual distribution of business sold*

Attachment 12 to this response provides the development of the nationwide expected lifetime loss ratio for policy form series 30240 for all policies in total, where expected experience has been developed using the distribution of business actually sold projected from issue using all original pricing assumptions.

- g. *actual past experience (claims, mortality, lapse) but original assumptions in the future, with all premiums at the original premium scale from inception.*

Attachment 13 provides the nationwide actual historical and projected future earned premiums and incurred claims, based on actual policies in force as of June 30, 2018 where actual premiums have been restated to reflect the accumulated 33.1% premium rate increase as approved in Virginia and implemented from 2006 through 2016 on a nationwide basis and projected premiums have been restated to assume the original Virginia premium rate level (i.e. with no prior rate increases and future experience is projected using all original pricing assumptions).

Projections a-g can be separate tabs or combined into separate columns on the same exhibit.

4. *For each of the four subsets of the business above, please provide the active life reserves balance as of the projection date on a nationwide basis.*

Table 4
Active Life Reserve Balances
As of June 30, 2018

Benefit Period	With Inflation	Without Inflation
Lifetime	\$338,776,418	\$6,781,658
Non-Lifetime	\$366,668,378	\$8,783,268

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Mr. Dismore, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at anju.x.gupta-lavey@ampf.com.

Respectfully,



Anju Gupta-Lavey, FSA, MAAA
Director – Actuary
RiverSource Life Insurance Company

- Attachment 1: Nationwide Experience Restated to Current Virginia Premium Level
- Attachment 2: Nationwide Experience with Proposed Virginia Premium Levels since Inception
- Attachment 3: Virginia Experience with Proposed Virginia Premium Levels since Inception
- Attachment 4: Status of Long-Term Care Premium Rate Increase Filings as of July 12, 2018
- Attachment 5: Nationwide Experience with Historical and Projected Experience Restated to Original Virginia Premium Levels since Inception
- Attachment 6: Nationwide Experience with Historical Experience Restated to Current Virginia Premium Level and Projected Experience Restated to Original Virginia Premium Level
- Attachment 7: Expected Lifetime Loss Ratio Based on Original Pricing Assumptions
- Attachment 8: Active Life Reserve Balances by Calendar Year
- Enclosures: Revised Actuarial Memorandum and Premium Rate Tables
Revised Rate Revision Checklist
Revised Rate Request Summary
Microsoft Excel Workbook with Actuarial Memorandum Exhibits
Microsoft Excel Workbook with Response Attachments



IDS Life Insurance Company

IDS Tower 10
Minneapolis, Minnesota 55440

NAIC #65005 004
FEIN #41-0823832

STATE OF VIRGINIA
BUREAU OF INSURANCE

97 SEP 17

September 8, 1997

Robert R. Knapp
Senior Insurance Market Examiner
Forms and Rates Section
Life and Health Division
Commonwealth of Virginia
P.O. Box 1157
Richmond, Virginia 23218

RE: Submission No: 007 0000008225
Form No. 30160 A-VA
Your letter of September 2, 1997

Dear Mr. Knapp:

Pursuant to your letter of September 2, 1997, please find enclosed final-print copies (pursuant to 14 VAC 5-100-50 3) of our individual Long-Term Care Insurance Policy 30160A-VA, Nonforfeiture Benefit Option, Form 30165 A; Application Form 34776 A; and Outline of Coverage, Form 31700 A.

The Notice to Applicant Regarding Replacement, Form 33238 A, as well as the Waiver Regarding Replacement of Existing Coverage, Form 33231 are already on file with Forms and Rates Section of the Commonwealth of Virginia, but are sent along as representative copies to be used with the product submitted for review.

If you have any questions, or if I may be of assistance to your review, please contact me at (612) 671-8584, or FAX 612-671-3880.

Sincerely,

Lana Schiltz, Contract Analyst
IDS Life Insurance Product Development T8/848

Encl.

APPROVED
Commonwealth Of Virginia
State Corporation Commission
Bureau Of Insurance
DATE 10-2-97
BY O/K

IDS Life Insurance Company
IDS Tower 10
Minneapolis, Minnesota 55440
Tele: 612-671-3733

Nonforfeiture Benefit Rider

This rider was issued on the basis of Your application and payment of the required premium. This rider is made a part of the policy. This rider is subject to all terms, exceptions, and provisions of the policy unless changed by this rider. All changes are explained below.

If Your policy terminates due to nonpayment of premiums, it will continue automatically with a Reduced Lifetime Benefit. Your Facility Care Daily Benefit amount, Home and Community Care Daily Maximum Benefit amount, and Deductible Period will not change after the date of lapse. Increases to the Facility Care Daily Benefit amount and the Home and Community Care Daily Maximum Benefit amount as provided under the Benefit Increases Option, if applicable to the policy, will cease to apply.

The amount of Your Reduced Lifetime Benefit will be the total of all policy premiums paid including the premium for this nonforfeiture benefit.

If the policy has been in force for at least 3 years, the Reduced Lifetime Benefit will not be less than thirty (30) times the Facility Care Daily Maximum Benefit amount at the time of lapse.

The Reduced Lifetime Benefit will apply only to benefit amounts paid:

- for Facility Care that occurs after the lapse date, and
- for Home and Community Care You receive after the lapse date.

In no case will the sum of:

1. The expenses incurred for Facility Care while the policy was in force, and the expenses incurred for Facility Care after the lapse date, exceed the Lifetime Maximum Benefit amount as stated in the Schedule in effect at the time of lapse; and
2. The expenses incurred for Home and Community Care You receive for which benefits were paid while the policy was in force, and the expenses incurred for Home and Community Care You receive for which benefits were paid after the lapse date, exceed the Lifetime Maximum Benefit amount as stated in the Schedule in effect at the date of lapse.

This rider is issued as of the policy date of the policy unless a different date is shown here.

IDS Life Insurance Company

William R. Stolzmann

Secretary

Commonwealth Of Virginia
State Corporation Commission
Bureau Of Insurance
DATE _____
BY *10-29-97*
PK

**RiverSource Life Insurance Company
Long-Term Care Insurance
Nonforfeiture Benefit Rider**

**Rider Form 30165A
(For Policy Form 30160A-VA, with Endorsement Form 32100)**

Issue Age	Percentage of Premium
40	30%
41	30%
42	30%
43	30%
44	30%
45	30%
46	30%
47	30%
48	30%
49	30%
50	30%
51	30%
52	30%
53	30%
54	30%
55	30%
56	30%
57	30%
58	30%
59	30%
60	30%
61	30%
62	30%
63	30%
64	30%
65	30%
66	29%
67	28%
68	27%
69	26%
70	25%
71	24%
72	23%
73	22%
74	21%
75	20%
76	19%
77	18%
78	17%
79	16%
80	15%
81	15%
82	15%
83	15%
84	15%

May 6, 2019

Mr. Bill Dismore
Virginia Bureau of Insurance

Via SERFF

RE: RiverSource Life Insurance Company ("RiverSource Life")
Company NAIC # 65005
Company FEIN # 41-0823832
SERFF Tracking # AERS-131005512
Policy Form: Long Term Care Policy Form 30160A-VA
Long Term Care Insurance Endorsement Form 32100

Dear Mr. Dismore:

Thank you for reviewing our filing. This letter is in response to your letter dated April 12, 2019 objection letter regarding information needed for this premium rate increase filing. I restate your comments in italics for reference.

- 1) In your response of 12/12/2018, the Company states that they can actuarially justify a much larger rate increase than the 40% requested. Please provide a detailed explanation of the Company's plans for future rate increase if the 40% rate increase were approved. Provide a description of the lifetime loss ratio to which the Company will manage this block of business going forward and what would trigger a request for an additional rate increase.*

As described in section 16 of the revised Actuarial Memorandum provided at the time of my December 12, 2018 response, the reason for the requested premium rate increase is due to a combination of actual lapse and mortality running less than expected in pricing and actual morbidity experience worse than expected for older attained ages. A premium rate increase is considered an effective way to reduce projected losses.

Table 1 shows the isolated impact on the projected lifetime loss ratios of future deviations in each key driver from original assumptions and the corresponding premium rate increase needed to produce the target lifetime loss ratio, separately for policies with a lifetime benefit period and policies with non-lifetime benefit periods. This target lifetime loss ratio represents the lifetime loss ratio using historical experience combined with projected future experience based on our original pricing assumptions and is 74.8% for policies with a lifetime benefit period and 70.4% for policies with non-lifetime benefit periods.

Note that Table 1 has been developed using nationwide historical experience through June 30, 2018, where actual and projected premiums reflect the accumulated rate increases as approved in Virginia and implemented from 2007 through 2016 on a nationwide basis.

Table 1
RiverSource Life Insurance Company
Impact on Lifetime Loss Ratio of Changing from Original Pricing to Current Assumptions
Nationwide Experience Before Any Premium Rate Increase
Adjusted for Prior Approved Premium Rate Increase on a Nationwide Basis
Policy Form 30160A, Subject to Endorsement Form 32100

Policies with a Lifetime Benefit Period			
Assumptions	Lifetime Loss Ratio	Impact on Lifetime Loss Ratio	Premium Rate Increase Needed to Produce a Lifetime Loss Ratio of 74.8%
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions	74.8%	N/A	N/A
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	84.3%	9.5%	65.5%
Mortality	77.4%	2.6%	17.0%
Lapse	100.0%	25.2%	140.0%
Interest	79.1%	4.3%	27.8%
Historical Experience through 6/30/2018 & Projections with All Current Assumptions	127.1%	52.3%	263.5%

Policies with Non-Lifetime Benefit Periods			
Assumptions	Lifetime Loss Ratio	Impact on Lifetime Loss Ratio	Premium Rate Increase Needed to Produce a Lifetime Loss Ratio of 70.4%
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions	70.4%	N/A	N/A
Historical Experience through 6/30/2018 & Projections with Original Pricing Assumptions except for Current:			
Morbidity	74.2%	3.8%	31.3%
Mortality	72.6%	2.2%	17.7%
Lapse	84.5%	14.1%	96.9%
Interest	74.1%	3.7%	28.5%
Historical Experience through 6/30/2018 & Projections with All Current Assumptions	96.8%	26.4%	165.5%

Note that the lifetime loss ratio for each changed assumption in Table 1 does not reflect any synergy of the assumptions. As a result, the total impact of all current assumptions on the lifetime loss ratio for policies with a lifetime benefit period (i.e. 52.3%) is greater than the sum of the impact of each changed assumption (i.e. $41.6\% = 9.5\% + 2.6\% + 25.2\% + 4.3\%$) and the total impact of all current assumptions on the lifetime loss ratio for policies with non-lifetime benefit periods (i.e. 26.4%) is greater than the sum of the impact of each changed assumption (i.e. $31.2\% = 6.2\% + 2.3\% + 18.8\% + 3.9\%$).

As the results in Table 1 show, premium rate increases that far exceed the requested increase are currently actuarially justified.

The company is currently requesting premium rate increases in most states to bring the cumulative increase to 196.6% for policies with a lifetime benefit period and 135.9% for policies with non-lifetime benefit periods. To bring the premiums on this policy form issued with endorsement in Virginia to this level currently being requested nationwide, a 122.8% premium rate increase for policies with a lifetime benefit period and an 77.2% premium rate increase for policies with non-lifetime benefit periods are necessary. These premium rate increases necessary to bring premiums in Virginia in the nationwide level are much lower than the actuarially justifiable premium rate increases shown in Table 1 above. However, the company believes it is appropriate to limit the current premium rate increase request to 40% in order to minimize the impact on policyholders to the extent we can, with the understanding that the company anticipates seeking additional premium rate increases in Virginia at the end of the three-year rate guarantee period.

If it is the Bureau's preference, we are willing to modify this rate filing to request the following premium rate increases to bring premiums on this policy form in Virginia to the level currently being requested nationwide:

- a 122.8% premium rate increase for policies with a lifetime benefit period, spread over five years with an implementation schedule of four consecutive annual premium rate increases of 17.4% each; and
- a 77.2% premium rate increase for policies with non-lifetime benefit periods, spread over five years with an implementation schedule of four consecutive annual premium rate increases of 12.1% each.

As indicated in my December 12, 2018 response and above, the company does anticipate seeking additional premium rate increases in the future, above a 135.9% increase for policies with a lifetime benefit period and 77.2% for policies with non-lifetime benefit periods, even if experience does not deteriorate from current best estimates.

If it is the Bureau's position to only allow future additional premium rate increases if experience deteriorates from current best estimates, we believe a 161.9% premium rate increase for policies with a lifetime benefit period and an 105.0% premium rate increase for policies with non-lifetime benefit periods would be required at this time. If there is deterioration from current best-estimates, additional premium rate increases beyond this level would be required in the future.

- 2) *If the 40% rate increase were to be approved, the VA Cumulative Rate Increase would equal 86% while the nationwide increase is 68%. Please provide an explanation for this discrepancy in support of the Company's 40% rate increase request compared to a lesser increase of 26% which would bring the VA cumulative increase in line with the nationwide cumulative increase.*

As described above, the company is currently requesting premium rate increases in most states to bring the cumulative increase to 196.6% for policies with a lifetime benefit period and 135.9% for policies with non-lifetime benefit periods. The company has requested or anticipated eventually requesting premium rate increases in all forty-eight jurisdictions where policy form 30160A issued with endorsement form 32100 was sold, in order to bring premiums in each jurisdiction to the level currently being requested nationwide. Attachment 1 to this letter provides a list of the forty-eight jurisdictions (including the District of Columbia) where policy form 30160A issued with endorsement form 32100 was offered, with the status of all currently requested premium rate increases as of May 6, 2019 and the history of all previous rate revisions which first began in 2007.

I, Anju Gupta-Lavey, am an Actuary for RiverSource Life Insurance Company. I am a Member of the American Academy of Actuaries, and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.



Mr. Dismore, thank you for working with us to complete this filing in Virginia. Please let me know if you would find additional information helpful or if you have any questions. You can reach me directly at (612) 671-2909 or by email at anju.x.gupta-lavey@ampf.com.

Respectfully,



Anju Gupta-Lavey, FSA, MAAA
Director – Actuary
RiverSource Life Insurance Company

Attachment 1: Status of Long-Term Care Premium Rate Increase Filings as of May 6, 2019

Attachment 1
RiverSource Life Insurance Company
Status of Long Term Care Premium Rate Increase Filings as of May 6, 2019
Policy Form 30160A, Subject to Endorsement Form 32100

POLICIES WITH A LIFETIME BENEFIT PERIOD																										
State	First Nationwide Request			Follow-Up Request			Second Nationwide Request			Third Nationwide Request			Fourth Nationwide Request			Fifth Nationwide Request			Sixth Nationwide Request				Cumulative Rate Increase	Inforce as of 6/30/2018		
	Date of Disposition	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Submission	Rate Increase	Effective Date	Date of Disposition	Rate Increase	Effective Date	Date of Submission	Date of Disposition	Rate Increase	Effective Date		Policies	Annualized Premium	
Alabama	6/19/2007	10.0%	9/2007				8/9/2011	10.0%	1/2012	11/20/2012	10.0%	4/2013	11/5/2015	15.0%	9/2016	4/6/2018	15.0%	10/2018					76.0%	154	341,174	
Alaska ¹	4/4/2007	10.0%	9/2007				N/A	10.0%	5/2011	N/A	10.0%	4/2013	N/A	15.0%	9/2015	N/A	15.0%	10/2017	N/A	N/A	68.5% ¹²	6/2019	196.6%	0	0	
Arizona	6/7/2007	7.5%	9/2007				8/25/2011	12.6%	1/2012	7/23/2013	10.0%	11/2013	8/28/2015	15.0%	12/2015	4/8/2018	15.0%	7/2018					76.0%	124	290,362	
Arkansas	3/25/2008	10.0%	6/2008																				37.5%	84	108,233	
Colorado	5/3/2007	10.0%	9/2007				7/25/2011	10.0%	10/2011	8/8/2013	10.0%	1/2014	6/26/2015	15.0%	10/2015	4/25/2018	25.0%	8/2018					53.1%	146	343,970	
Connecticut	12/14/2007	5.0%	3/2008							10/17/2017	19.9%	1/2018	4/3/2019	19.9%	7/2019								50.9%	168	459,298	
Delaware	7/2/2007	10.0%	10/2007				8/4/2011	10.0%	11/2011	3/6/2013	10.0%	6/2013	10/26/2015	15.0%	2/2016	12/4/2017	15.0%	3/2018					76.0%	38	94,815	
District of Columbia																							0.0%	11	18,806	
Florida	10/18/2007	10.0%	1/2008				3/16/2017	41.0% ⁹	4/2018														55.1%	631	1,187,237	
Georgia	7/2/2007	6.0%	10/2007	7/29/2008	3.8%	11/2008	2/16/2011	6.0%	5/2011	1/16/2013	9.9%	4/2013	10/16/2015	10.0%	1/2016	9/15/2017	12.0%	1/2018	1/3/2019	2/4/2019	12.0%	6/2019	76.9%	335	735,457	
Hawaii	5/6/2008	10.0%	8/2008				11/3/2011	10.0%	2/2012	1/13/2014	10.0%	4/2014	32.3% Increase - Submitted 8/11/2015										33.1%	47	148,693	
Idaho	9/4/2007	10.0%	12/2007				5/12/2011	10.0%	8/2011	12/19/2013	10.0%	4/2014	2/11/2016	15.0%	5/2016								53.1%	15	41,611	
Illinois ²	9/12/2007	10.0%	12/2007				3/29/2011	10.0%	7/2011	10/25/2013	10.0%	2/2014	1/21/2016	15.0%	5/2016	15% Increase - Submitted 3/9/2018							53.1%	385	931,316	
Indiana	4/11/2010	10.0%	7/2010				4/10/2013	10.0%	7/2013	12/7/2015	10.0%	3/2016											33.1%	102	232,777	
Iowa ³	2/5/2008	10.0%	5/2008				4/26/2011	10.0%	8/2011	4/3/2013	10.0%	7/2013	8/25/2015	15.0%	12/2015	9/13/2017	15.0%	12/2017	12/21/2018	4/10/2019	30.0% ¹³	6/2019	128.8%	288	664,994	
Kentucky	6/14/2007	10.0%	10/2007				2/14/2011	10.0%	5/2011	4/23/2013	10.0%	8/2013	8/17/2015	10.0%	12/2015	8/16/2017	20.2%	12/2017					68.5% Increase - Submitted 1/23/2019	76.0%	113	279,058
Louisiana	9/7/2007	10.0%	5/2008				11/9/2011	10.0%	2/2012	1/17/2013	10.0%	2/2014	6/28/2016	15.0%	10/2016	7/30/2018	15.0%	11/2018					76.0%	194	359,786	
Maine	3/28/2007	10.0%	9/2007				6/20/2011	10.0%	10/2011	9/17/2013	10.0%	12/2013	8/10/2016	14.8%	4/2017				16.0% Increase - Submitted 4/2/2019				52.8%	72	198,573	
Maryland	9/25/2007	10.0%	1/2008				7/15/2011	10.0%	1/2012	6/5/2013	10.0%	9/2013	11/16/2015	15.0%	2/2016								53.1%	329	876,131	
Massachusetts	6/1/2012	10.0%	10/2012				1/20/2017	10.0%	10/2017														21.0%	211	520,128	
Michigan	4/9/2007	10.0%	9/2007				12/18/2010	10.0%	5/2011	12/4/2012	10.0%	4/2013	5/6/2015	15.0%	9/2015	4/21/2017	15.0%	10/2017	11/29/2018	1/3/2019	68.5% ¹²	6/2019	196.6%	504	1,301,966	
Minnesota ⁴	8/9/2007	10.0%	11/2007				3/9/2011	10.0%	6/2011	2/20/2014	10.0%	6/2014	2/5/2016	15.0%	5/2016	10/31/2018	1/11/2019	72.5% ¹⁴	6/2019				164.1% ¹⁵	344	815,943	
Mississippi	7/18/2007	10.0%	10/2007				3/1/2011	10.0%	6/2011	4/22/2013	10.0%	8/2013	5/14/2015	15.0%	9/2015	12/13/2017	15.0%	3/2018					76.0%	59	132,845	
Missouri	5/2/2007	10.0%	9/2007				2/17/2011	10.0%	5/2011	5/7/2013	10.0%	8/2013	3/10/2015	15.0%	9/2015	4/13/2017	15.0%	10/2017	11/13/2018	12/14/2018	68.5% ¹²	6/2019	196.6%	268	603,865	
Montana	8/8/2007	10.0%	11/2007				1/14/2011	10.0%	5/2011	2/21/2013	10.0%	6/2013	7/13/2015	15.0%	11/2015	11/24/2017	13.2%	3/2018					73.3%	42	84,650	
Nebraska	6/25/2007	10.0%	10/2007				5/11/2011	10.0%	8/2011	2/14/2013	10.0%	5/2013	2/23/2016	34.9%	9/2016								79.6%	234	515,580	
Nevada	10/15/2014	33.1% ¹⁶	3/2015													11/6/2018	32.3%	3/2018					76.0%	97	252,976	
New Hampshire	5/25/2007	10.0%	9/2007				6/12/2011	10.0%	9/2011	4/19/2013	10.0%	8/2013	10/7/2015	15.0% ⁶	1/2016								53.1% ⁸	62	164,705	
New Jersey ³	6/19/2007	10.0%	9/2007				8/9/2011	10.0%	1/2012	12/4/2012	10.0%	4/2013	11/5/2015	15.0%	9/2016	4/6/2018	15.0%	10/2018					76.0%	378	1,136,312	
New Mexico	7/23/2007	10.0%	11/2007				1/11/2016	8.0%	9/2016							6/12/2018	10.0%	9/2018					30.7%	36	51,263	
North Carolina ²	8/1/2007	10.0%	11/2007				3/10/2011	10.0%	6/2011	6/26/2013	10.0%	10/2013	6/26/2015	15.0%	10/2015	6/9/2017	15.0%	10/2017					68.5% Increase - Submitted 12/19/2018	76.0%	271	697,129
North Dakota	3/27/2007	10.0%	9/2007				2/1/2011	10.0%	5/2011	3/11/2013	10.0%	6/2013	6/3/2015	10.0%	9/2015	9/14/2017	20.2%	1/2018	12/5/2018	1/9/2019	44.0% ¹⁷	6/2019	153.4%	95	189,908	
Ohio	6/21/2007	10.0%	9/2007				3/17/2011	10.0%	6/2011	4/20/2015	10.0%	7/2015	2/12/2017	15.0%	5/2017				12/13/2018	2/6/2019	15.0%	6/2019	76.0%	392	905,848	
Oklahoma ²	8/21/2008	10.0%	11/2008				9/15/2011	10.0%	1/2012	9/16/2013	10.0%	12/2013	10/7/2015	10.0%	1/2016	3/27/2018	10.0%	7/2018					61.1%	77	150,240	
Oregon	4/23/2007	10.0%	9/2007				8/15/2011	10.0%	1/2012	11/18/2013	10.0%	2/2014	11/5/2015	15.0%	9/2016								53.1%	116	298,359	
Pennsylvania ²	9/17/2007	10.0%	12/2007				3/21/2011	10.0%	6/2011	5/6/2013	10.0%	8/2013	9/16/2015	15.0%	12/2015	8/24/2017	15.0%	12/2017					68.5% Increase - Submitted 1/29/2019	76.0%	453	1,238,287
Rhode Island	2/28/2008	10.0%	6/2008				10/24/2011	10.0%	2/2012	10/20/2016	10.0%	9/2017											33.1%	26	69,101	
South Carolina	5/21/2007	10.0%	9/2007				3/10/2011	10.0%	6/2011	3/22/2013	10.0%	7/2013	5/7/2015	15.0%	9/2015	9/1/2017	15.0%	12/2017					68.5% Increase - Submitted 11/29/2018	76.0%	171	398,331
South Dakota ²	9/28/2007	10.0%	1/2008				12/23/2010	10.0%	5/2011	1/28/2013	10.0%	5/2013	9/4/2015	15.0%	12/2015	8/18/2017	15.0%	12/2017	2/6/2019	2/15/2019	68.5% ¹²	6/2019	196.6%	76	158,947	
Tennessee	4/30/2007	10.0%	9/2007				1/14/2011	10.0%	5/2011	4/8/2013	10.0%	7/2013	8/3/2015	15.0%	11/2015	10/5/2017	15.0%	1/2018					68.5% Increase - Submitted 1/8/2019	76.0%	395	935,701
Texas ⁴	10/29/2007	10.0%	2/2008				9/9/2011	10.0%	12/2011	2/10/2016	26.5%	5/2016							12/5/2018	1/9/2019	38.0% ¹⁸	6/2019	111.2%	600	1,316,789	
Texas ⁵	2/10/2016	26.5%	5/2016																12/5/2018	1/9/2019	38.0% ¹⁸	6/2019	74.6%	203	391,760	
Utah	11/14/2007	10.0%	2/2008				3/17/2011	10.0%	6/2011	10/7/2013	10.0%	1/2014	3/3/2016	15.0%	6/2016	2/9/2018	15.0%	6/2018					76.0%	57	128,614	
Vermont	40% Increase - Submitted 11/15/2017																						0.0%	16	31,817	
Virginia	6/21/2007	10.0%	9/2007				11/26/2011	10.0%	3/2012	12/3/2014	10.0%	6/2015											40% Increase - Submitted 8/3/2017	33.1%	628	1,318,385
Washington	8/6/2007	10.0%	11/2007	10/20/2008	10.0%	1/2009	5/2/2011	10.0%	8/2011	10/23/2013	15.0%	2/2014	8/10/2016	15.0%	11/2016	15% Increase - Submitted 1/26/2018							76.0%	160	504,860	
West Virginia	5/3/2007	10.0%	9/2007				3/18/2011	10.0%	6/2011	8/23/2013	10.0%	11/2013														

Attachment 1
RiverSource Life Insurance Company
Status of Long Term Care Premium Rate Increase Filings as of May 6, 2019
Policy Form 30160A, Subject to Endorsement Form 32100

POLICIES WITH NON-LIFETIME BENEFIT PERIODS																									
State	First Nationwide Request			Follow-Up Request			Second Nationwide Request			Third Nationwide Request			Fourth Nationwide Request			Fifth Nationwide Request			Sixth Nationwide Request				Cumulative Rate	Inforce as of 6/30/2018	
	Date of	Rate	Effective	Date of	Rate	Effective	Date of	Rate	Effective	Date of	Rate	Effective	Date of	Rate	Effective	Date of	Rate	Effective	Date of	Date of	Rate	Effective		Policies	Annualized
Alabama	6/19/2007	10.0%	9/2007				8/9/2011	10.0%	1/2012	11/20/2012	10.0%	4/2013	11/5/2015	15.0%	9/2016	4/6/2018	15.0%	10/2018				76.0%	13	31,118	
Alaska	4/4/2007	10.0%	9/2007				N/A	10.0%	5/2011	N/A	10.0%	4/2013	N/A	15.0%	9/2015	N/A	15.0%	10/2017	N/A	N/A	34.0% ¹²	6/2019	135.9%	214	377,933
Arizona	6/7/2007	7.5%	9/2007				8/25/2011	12.6%	1/2012	7/23/2013	10.0%	11/2013	8/28/2015	15.0%	12/2015	4/8/2018	15.0%	7/2018				76.0%	116	126,216	
Arkansas	3/25/2008	10.0%	6/2008													4/25/2018	25.0%	8/2018				37.5%	215	377,212	
Colorado	5/3/2007	10.0%	9/2007				7/25/2011	10.0%	10/2011	8/8/2013	10.0%	1/2014	6/26/2015	15.0%	10/2015							53.1%	466	919,065	
Connecticut	12/14/2007	5.0%	3/2008							10/17/2017	19.9%	1/2018	4/3/2019	19.9%	7/2019							50.9%	87	204,104	
Delaware	7/2/2007	10.0%	10/2007				8/4/2011	10.0%	11/2011	3/6/2013	10.0%	6/2013	10/26/2015	15.0%	2/2016	12/4/2017	15.0%	3/2018				76.0%	24	35,648	
District of Columbia																						0.0%	1,210	1,676,160	
Florida	10/18/2007	10.0%	1/2008				3/16/2017	41.0% ⁶	4/2018													55.1%	256	441,342	
Georgia	7/2/2007	6.0%	10/2007	7/29/2008	3.8%	11/2008	2/16/2011	6%	5/2011	1/16/2013	9.9%	4/2013	10/16/2015	10.0%	1/2016	9/15/2017	12.0%	1/2018	1/3/2019	2/4/2019	12.0%	6/2019	76.9%	289	639,048
Hawaii	5/6/2008	10.0%	8/2008				11/3/2011	10.0%	2/2012	1/13/2014	10.0%	4/2014	32.3% Increase - Submitted 8/11/2015									33.1%	60	125,584	
Idaho	9/4/2007	10.0%	12/2007				5/12/2011	10.0%	8/2011	12/19/2013	10.0%	4/2014	2/11/2016	15.0%	5/2016							53.1%	610	1,095,638	
Illinois	9/12/2007	10.0%	12/2007				3/29/2011	10.0%	7/2011	10/25/2013	10.0%	2/2014	1/21/2016	15.0%	5/2016	15% Increase - Submitted 3/9/2018						53.1%	152	238,455	
Indiana	4/11/2010	10.0%	7/2010				4/10/2013	10.0%	7/2013	12/7/2015	10.0%	3/2016										33.1%	274	501,304	
Iowa	2/5/2008	10.0%	5/2008				4/26/2011	10.0%	8/2011	4/3/2013	10.0%	7/2013	8/25/2015	15.0%	12/2015	9/13/2017	15.0%	12/2017	12/21/2018	4/10/2019	30.0% ¹³	6/2019	128.8%	167	332,255
Kentucky	6/14/2007	10.0%	10/2007				2/14/2011	10.0%	5/2011	4/23/2013	10.0%	8/2013	8/17/2015	10.0%	12/2015	8/16/2017	20.2%	12/2017	34.0% Increase - Submitted 1/23/2019			76.0%	141	202,417	
Louisiana	9/7/2007	10.0%	5/2008				1/19/2011	10.0%	2/2012	1/17/2013	10.0%	2/2014	6/28/2016	15.0%	10/2016	7/30/2018	15.0%	11/2018				76.0%	264	519,310	
Maine	3/28/2007	10.0%	9/2007				6/20/2011	10.0%	10/2011	9/17/2013	10.0%	12/2013	8/10/2016	14.8%	4/2017	16.0% Increase - Submitted 4/2/2019						52.8%	603	1,169,989	
Maryland	9/25/2007	10.0%	1/2008				7/15/2011	10.0%	1/2012	6/5/2013	10.0%	9/2013	11/16/2015	15.0%	2/2016							53.1%	910	1,685,235	
Massachusetts	6/1/2012	10.0%	10/2012				1/20/2017	10.0%	10/2017													21.0%	881	1,717,760	
Michigan	4/9/2007	10.0%	9/2007				12/18/2010	10.0%	5/2011	12/4/2012	10.0%	4/2013	5/6/2015	15.0%	9/2015	4/21/2017	15.0%	10/2017	11/29/2018	1/3/2019	34.0% ¹²	6/2019	135.9%	676	1,154,301
Minnesota	8/9/2007	10.0%	11/2007				3/9/2011	10.0%	6/2011	2/20/2014	10.0%	6/2014	2/5/2016	15.0%	5/2016				10/31/2018	1/11/2019	72.5% ¹⁴	6/2019	164.1% ¹⁴	25	56,846
Mississippi	7/18/2007	10.0%	10/2007				3/1/2011	10.0%	6/2011	4/22/2013	10.0%	8/2013	5/14/2015	15.0%	9/2015	12/13/2017	15.0%	3/2018				76.0%	241	420,857	
Missouri	5/2/2007	10.0%	9/2007				2/17/2011	10.0%	5/2011	5/7/2013	10.0%	8/2013	3/10/2015	15.0%	9/2015	4/13/2017	15.0%	10/2017	11/13/2018	12/14/2018	34.0% ¹²	6/2019	135.9%	54	86,053
Montana	8/8/2007	10.0%	11/2007				1/14/2011	10.0%	5/2011	2/21/2013	10.0%	6/2013	7/13/2015	15.0%	11/2015	11/24/2017	13.2%	3/2018				73.3%	137	241,644	
Nebraska	6/25/2007	10.0%	10/2007				5/11/2011	10.0%	8/2011	2/14/2013	10.0%	5/2013	2/23/2016	34.9%	9/2016							79.6%	94	171,688	
Nevada	10/15/2014	33.1%	3/2015													11/6/2018	32.3%	3/2018				76.0%	289	552,614	
New Hampshire	5/25/2007	10.0%	9/2007				6/12/2011	10.0%	9/2011	4/19/2013	10.0%	8/2013	10/7/2015	15.0% ⁵	1/2016							53.1% ⁵	662	1,417,721	
New Jersey	6/19/2007	10.0%	9/2007				8/9/2011	10.0%	1/2012	12/4/2012	10.0%	4/2013	11/5/2015	15.0%	9/2016	4/6/2018	15.0%	10/2018				76.0%	51	70,594	
New Mexico	7/23/2007	10.0%	11/2007				1/11/2016	8.0%	9/2016							6/12/2018	10.0%	9/2018				30.7%	417	817,979	
North Carolina	8/1/2007	10.0%	11/2007				3/10/2011	10.0%	6/2011	6/26/2013	10.0%	10/2013	6/26/2015	15.0%	10/2015	6/9/2017	15.0%	10/2017	34.0% Increase - Submitted 12/19/2018			76.0%	59	99,446	
North Dakota	3/27/2007	10.0%	9/2007				2/1/2011	10.0%	5/2011	3/11/2013	10.0%	6/2013	6/3/2015	10.0%	9/2015	9/14/2017	20.2%	1/2018	12/5/2018	1/9/2019	34.0% ¹³	6/2019	153.4%	905	1,677,738
Ohio	6/21/2007	10.0%	9/2007				3/17/2011	10.0%	6/2011	4/20/2015	10.0%	7/2015	2/12/2017	15.0%	5/2017				12/13/2018	2/6/2019	15.0%	6/2019	76.0%	56	79,563
Oklahoma	8/21/2008	10.0%	11/2008				9/15/2011	10.0%	1/2012	9/16/2013	10.0%	12/2013	10/7/2015	10.0%	1/2016	3/27/2018	10.0%	7/2018				61.1%	374	720,661	
Oregon	4/23/2007	10.0%	9/2007				8/15/2011	10.0%	1/2012	11/18/2013	10.0%	2/2014	11/5/2015	15.0%	9/2016				34.0% Increase - Submitted 1/29/2019			53.1%	919	1,904,780	
Pennsylvania	9/17/2007	10.0%	12/2007				3/21/2011	10.0%	6/2011	5/6/2013	10.0%	8/2013	9/16/2015	15.0%	12/2015	8/24/2017	15.0%	12/2017	34.0% Increase - Submitted 1/29/2019			76.0%	80	147,951	
Rhode Island	2/28/2008	10.0%	6/2008				10/24/2011	10.0%	2/2012	10/20/2016	10.0%	9/2017							33.1%			203	345,176		
South Carolina	5/21/2007	10.0%	9/2007				3/10/2011	10.0%	6/2011	3/22/2013	10.0%	7/2013	5/7/2015	15.0%	9/2015	9/1/2017	15.0%	12/2017	34.0% Increase - Submitted 11/29/2018			76.0%	52	90,636	
South Dakota	9/28/2007	10.0%	1/2008				12/23/2010	10.0%	5/2011	1/28/2013	10.0%	5/2013	9/4/2015	15.0%	12/2015	8/18/2017	15.0%	12/2017	2/6/2019	2/15/2019	34.0% ¹⁴	6/2019	135.9%	272	465,840
Tennessee	4/30/2007	10.0%	9/2007				1/14/2011	10.0%	5/2011	4/8/2013	10.0%	7/2013	8/3/2015	15.0%	11/2015	10/5/2017	15.0%	1/2018	34.0% Increase - Submitted 1/8/2019			76.0%	939	1,478,147	
Texas	10/29/2007	10.0%	2/2008				9/9/2011	10.0%	12/2011	2/10/2016	26.5%	5/2016							12/5/2018	1/9/2019	38.0% ¹⁵	6/2019	111.2%	291	412,854
Texas	2/10/2016	26.5%	5/2016																12/5/2018	1/9/2019	38.0% ¹⁵	6/2019	74.6%	122	202,945
Utah	11/14/2007	10.0%	2/2008				3/17/2011	10.0%	6/2011	10/7/2013	10.0%	1/2014	3/3/2016	15.0%	6/2016	2/9/2018	15.0%	6/2018				76.0%	75	110,518	
Vermont	40% Increase - Submitted 11/15/2017																					0.0%	873	1,415,843	
Virginia	6/21/2007	10.0%	9/2007				11/26/2011	10.0%	3/2012	12/3/2014	10.0%	6/2015				40% Increase - Submitted 8/3/2017						33.1%	464	1,071,840	
Washington	8/6/2007	10.0%	11/2007	10/20/2008	10.0%	1/2009	5/2/2011	10.0%	8/2011	10/23/2013	15.0%	2/2014	8/10/2016	15.0%	11/2016	15% Increase - Submitted 1/26/2018						76.0%	57	119,136	
West Virginia	5/3/2007	10.0%	9/2007				3/18/2011	10.0%	6/2011	8/23/2013	10.0%	11/2013	6/2/2015	15.0%	9/2015	5/1/2017	15.0%	10/2017				76.0%	287	591,808	
Wisconsin	6/27/2007	10.0%	10/2007				3/17/2011	10.0%	6/2011	2/6/2013	10.0%	6/2013	5/15/2015	15.0% ¹⁰	9/2015	6/27/2017	15.0% ¹⁰	10/2017	3/21/2019	4/11/2019	30.4% ¹⁰	9/2019	129.5% ¹⁰	10	22,180
Wyoming	3/13/2007	10.0%	9/2007				1/28/2011	10.0%	5/2011	6/13/2013	10.0%	9/2013	11/6/2015	15.0											